

From: Julie Roys <julie@julieroys.com>
Sent: Tuesday, March 23, 2021 5:14 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: [External] Questions concerning 2005 gang rape
Attach: Questions for Liberty University.docx

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Thanks for taking my call the other day. Attached are detailed questions for LU, several employees, and Jonathan Falwell concerning the 2005 alleged gang rape of [REDACTED]

[REDACTED] case resulted in the 2013 settlement between Liberty and the U.S. Dept of Education for Liberty's failure to comply with federal campus crime and security reporting requirements. However, it appears that because of a technicality, Liberty was able to avoid reporting that [REDACTED] was gang raped in 2005. Instead, the school was fined for not classifying the incident as an "Aggravated Assault, at a minimum."

[REDACTED] story raises many issues about Liberty's reporting of crimes and care for victims. The victim also is upset that Jonathan Falwell allegedly promised that her case would be part of the third-party investigation Liberty is conducting, but it's not.

I would prefer to have actual conversations with sources concerning these issues. If that is possible, please let me know.

Thank you,
Julie Roys

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Lamb Rule 41
Exhibit 10(a)

LU004027

Questions for Liberty University & LU employees/trustee regarding the alleged gang rape of [REDACTED] on April 13, 2005:

- **For Mark Hine, Dave Young:** According to a witness and emails, you were told about [REDACTED] rape in 2005 and Clery Act violations regarding reporting her rape. (One email says Wahlquist and her roommate talked to Young “quite a bit.”)
 - What actions did you take to rectify LU’s failure to report the rape?
 - What did you do to insure that [REDACTED] was cared for? Counseling, etc...?
 - [REDACTED] and her roommate requested cameras, better lighting, etc... to be installed in the tunnel that leads to and from East Campus, where the rape occurred. Why was this not done immediately?
- **For Jonathan Falwell:**
 - You were copied on the same emails Mark Hine & Dave Young received in 2005. Yet, when you met with [REDACTED], Karen Swallow Prior, and [REDACTED] in September, you reportedly said you had never heard about [REDACTED] 2005 gang rape. Can you explain?
 - Also, you reportedly promised [REDACTED] that LU’s investigation would include her case—that she’d “have a seat at the table.” Yet that hasn’t happened. Would you tell me why this happened?
- **For Liberty U:**
Background:

The Clery Act Fine Letter dated April 3, 2013 states (bold-face is mine):

“(A) female student was attacked by 3 males as she exited the pedestrian tunnel . . . The victim reported the attack the same day to LUPD, and provided a **written report on April 18, 2005** to LUPD. According to the victim’s written report to LUPD, the attackers used ‘a wooden type stick.’ . . . In **May 2005**, the victim again contacted LUPD and stated that she had been **sexually assaulted**. Liberty did not disclose the April 13, 2005 aggravated assault incident in its 2005 crime statistics. In its response, Liberty argues that the April 2005 incident was not included in its calendar

year 2005 crime statistics because ‘there was never a report made at all that complainant was sexually assaulted or raped in April 2005.’” (*This may technically be true because assailant reported the sexual assault component of the April 13, 2005, attack in May 2005.*)

The letter further states: “In **May 2005**, the victim again contacted LUPD and stated that she had been **gang-raped** by the same perpetrators that had previously sexually assaulted her. . .

“Liberty did not provide the Department with a legal or factual basis for not issuing a timely warning about the two sexual assaults reported to LUPD on February 20, 2005; the April 13, 2005 aggravated assault; and the alleged **gang-rape** reported by the same victim to LUPD in **May 2005**.” (*In talking to the Clery Investigator, it seems apparent that the DOE letter erred in this statement. The victim’s statement in May 2005 concerned the gang rape in April 2005, not a separate assault in May.*)

Similarly, the **March 23, 2010, DOE Program Review/FRPD** states:

“In **May 2005**, the complainant again contacted LUPD and stated that she was **sexually assaulted**. This report is documented in LUPD Lt. Jennifer Jones’ supplemental report dated May 20, 2005. . . .

“About a month later (after April 13 incident), the victim did state that she was **gang-raped** by the same men.”

Questions:

1. The victim has repeatedly requested all the LUPD reports regarding her assaults in 2005. Yet in all the documents she’s received from LUPD, two items are clearly missing. One is the **April 18, 2005, written report** that the victim gave LUPD. The second is the **May 2005 report** that the victim made, which stated that her April 2005 assault had been a “sexual assault” and “gang rape.” Why has the April 18, 2005, written report and the May 2005 report not been supplied to the victim? Would LUPD please release both items now?

2. Given what the victim reported on April 18, 2005, would you please explain why Liberty contended in an email to the News & Advance, "There is no indication that the attack was conducted with the purpose of inflicting severe bodily harm."
3. Also, given that the victim reported that she was gang raped, why has Liberty not reported this fact? (LU's 2005 Crime Statistics still does not mention a forcible sex offense on campus or an aggravated assault on campus.)
4. Can you explain why LU did not provide professional, outside counseling for [REDACTED] after her alleged gang rape?
5. Why did LUPD not turn [REDACTED] gang rape on April 13, 2005, over to Lynchburg PD as is their normal practice?
6. Why was no one charged with [REDACTED] rape, given that she identified one of her attackers and had previously alleged an attack by him? [REDACTED] also had reported the alleged rapist earlier for stalking her.

- **For Laura Wallace:**

- According to Mark Tinsley, a former LU dean, Laura Wallace called him sometime between 2000—2003, when he was a LUPD officer, and urged him to drop charges against a minor and an adult whom Tinsley arrested for being "drunk in public." (Tinsley said LUPD Chief Randy Smith told him that the two people charged were friends of an influential pastor.) Tinsley says he told Wallace that he would not drop the charges and that her request was illegal. Tinsley says Wallace then got angry and hung up. Tinsley adds that Randy Smith took control of the matter and dropped the charges against the two alleged offenders. I would like to hear Wallace's side of the story.
- When did Wallace become the administrator that LUPD reported to?
- When did oversight for LUPD pass from Wallace to Ron Sloan

- **For Liberty U:**

- Tinsley says he was called for a rape in progress on October 7, 2002. Tinsley says this was the rape for which [REDACTED] was later found to be the suspect. Tinsley says he responded to the alleged scene of the rape, but no one was there. Even so, Tinsley said he

wrote a report of the alleged crime. I requested Tinsley's report from LUPD, but LUPD says it has no report of the alleged rape. Would you please explain why that is?

From: Julie Roys <julie@julieroys.com>
Sent: Friday, March 26, 2021 8:36 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] Questions concerning 2005 gang rape

Thanks for the update. I look forward to your response.

On Fri, Mar 26, 2021 at 7:15 PM Lamb, Scott <scottlamb@liberty.edu> wrote:

We are working on this. -Scott

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From: Julie Roys <julie@julieroys.com>
Sent: Tuesday, March 23, 2021 5:13:39 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: [External] Questions concerning 2005 gang rape

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Thanks for taking my call the other day. Attached are detailed questions for LU, several employees, and Jonathan Falwell concerning the 2005 alleged gang rape of [REDACTED]

[REDACTED] case resulted in the 2013 settlement between Liberty and the U.S. Dept of Education for Liberty's failure to comply with federal campus crime and security reporting requirements. However, it appears that because of a technicality, Liberty was able to avoid reporting that [REDACTED] was gang raped in 2005. Instead, the school was fined for not classifying the incident as an "Aggravated Assault, at a minimum."

[REDACTED] story raises many issues about Liberty's reporting of crimes and care for victims. The victim also is upset that Jonathan Falwell allegedly promised that her case would be part of the third-party investigation Liberty is conducting, but it's not.

I would prefer to have actual conversations with sources concerning these issues. If that is possible, please let me know.

Thank you,
Julie Roys

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From: Julie Roys <julie@julieroys.com>
Sent: Thursday, April 1, 2021 1:11 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] Questions concerning 2005 gang rape

Scott,
Can you have these answers to me by end of the day Monday?

Thanks,
Julie

On Fri, Mar 26, 2021 at 7:15 PM Lamb, Scott <scottlamb@liberty.edu> wrote:
We are working on this. -Scott

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To: Lamb, Scott <scottlamb@liberty.edu>
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Thank you,
Julie Roys

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From: Julie Roys <julie@julieroys.com>
Sent: Tuesday, April 6, 2021 10:27 AM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] Questions concerning 2005 gang rape

Hi Scott,

Reaching out one last time. Are you planning on responding to my detailed questions? If so, would you please let me know when I should expect them?

Thank you,
Julie

On Thu, Apr 1, 2021 at 12:11 PM Julie Roys <julie@julieroys.com> wrote:

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Can you have these answers to me by end of the day Monday?

Thanks,
Julie

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Hi Scott,

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[REDACTED] case resulted in the 2013 settlement between Liberty and the U.S. Dept of Education for Liberty's failure to comply with federal campus crime and security reporting requirements. However, it appears that because of a technicality, Liberty was able to avoid reporting that [REDACTED] was gang raped in 2005. Instead, the school was fined for not classifying the incident as an "Aggravated Assault, at a minimum."

[REDACTED] story raises many issues about Liberty's reporting of crimes and care for victims. The victim also is upset that Jonathan Falwell allegedly promised that her case would be part of the third-party investigation Liberty is conducting, but it's not.

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Thank you,
Julie Roys

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From: Julie Roys <julie@julieroys.com>
Sent: Tuesday, April 6, 2021 11:55 AM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] Questions concerning 2005 gang rape

Sure. Thanks for the update.

On Tue, Apr 6, 2021 at 9:45 AM Lamb, Scott <scottlamb@liberty.edu> wrote:

Folks have been out (Easter and Spring Break).

Let me see what they're prepared to do this week.

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 6, 2021, at 10:26 AM, Julie Roys <julie@julieroys.com> wrote:

Hi Scott,

Reaching out one last time. Are you planning on responding to my detailed questions? If so, would you please let me know when I should expect them?

Thank you,
Julie

On Thu, Apr 1, 2021 at 12:11 PM Julie Roys <julie@julieroys.com> wrote:

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Can you have these answers to me by end of the day Monday?

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[REDACTED] story raises many issues about Liberty's reporting of crimes and care for victims. The victim also is upset that Jonathan Falwell allegedly promised that her case would be part of the third-party investigation Liberty is conducting, but it's not.

I would prefer to have actual conversations with sources concerning these issues. If that is possible, please let me know.

Thank you,
Julie Roys

Lamb Rule 41
Exhibit 10(e)

LU004045

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From: Julie Roys <julie@julieroys.com>
Sent: Thursday, April 15, 2021 4:54 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] Questions concerning 2005 gang rape

Scott,

Sorry I didn't respond earlier to your voicemail. I am holding and awaiting LU's response to the questions next week.

Thanks!
Julie

On Tue, Apr 6, 2021 at 10:55 AM Julie Roys <julie@julieroys.com> wrote:
Sure. Thanks for the update.

On Tue, Apr 6, 2021 at 9:45 AM Lamb, Scott <scottlamb@liberty.edu> wrote:
Folks have been out (Easter and Spring Break).

Let me see what they're prepared to do this week.

Scott Lamb
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Office (434) 592-6836

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Thank you,
Julie

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Scott,
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Thanks,
Julie

On Fri, Mar 26, 2021 at 7:15 PM Lamb, Scott <scottlamb@liberty.edu> wrote:
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From: Julie Roys <julie@julieroys.com>
Sent: Tuesday, March 23, 2021 5:13:39 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: [External] Questions concerning 2005 gang rape

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Thanks for taking my call the other day. Attached are detailed questions for LU, several employees, and Jonathan Falwell concerning the 2005 alleged gang rape of [REDACTED]

[REDACTED] case resulted in the 2013 settlement between Liberty and the U.S. Dept of Education for Liberty's failure to comply with federal campus crime and security reporting requirements. However, it appears that because of a technicality, Liberty was able to avoid reporting that [REDACTED] was gang raped in 2005. Instead, the school was fined for not classifying the incident as an "Aggravated Assault, at a minimum."

Lamb Rule 41
Exhibit 10(f)

LU004049

██████ story raises many issues about Liberty's reporting of crimes and care for victims. The victim also is upset that Jonathan Falwell allegedly promised that her case would be part of the third-party investigation Liberty is conducting, but it's not.

I would prefer to have actual conversations with sources concerning these issues. If that is possible, please let me know.

Thank you,
Julie Roys

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From: [REDACTED]
Sent: Wednesday, April 21, 2021 8:05 AM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: [External] Full Reporting Request

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Good Morning Scott,

I would like to request any and all documentation - police reports (#050465 et al), statements, investigation findings, and settlements - regarding my case. It is my understanding that there is more documentation but there would be high redaction if requested by a third party. As the victim, I am requesting full access to my reporting. I am hopeful that I can receive these in a timely manner as they were recently collected for Julie Roys.

Thank you
[REDACTED]

Lamb Rule 41
Exhibit 10(g)

LU004056

From: [REDACTED]
Sent: Wednesday, April 21, 2021 11:51 AM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: [External] Re: Full Reporting Request

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

In addition, I am requesting a FERPA form to allow Julie Roys to discuss the case. Please send that over as soon as possible.

On Wed, Apr 21, 2021 at 8:04 AM [REDACTED] wrote:
Good Morning Scott,

I would like to request any and all documentation - police reports (#050465 et al), statements, investigation findings, and settlements - regarding my case. It is my understanding that there is more documentation but there would be high redaction if requested by a third party. As the victim, I am requesting full access to my reporting. I am hopeful that I can receive these in a timely manner as they were recently collected for Julie Roys.

Thank you
[REDACTED]

Subject: Discuss Documents re: [REDACTED] Case

Location: Suite 2730 Legal Affairs Conference Room

Start: 4/23/2021 3:00 PM

End: 4/23/2021 3:30 PM

Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Corry, David M (Legal Affairs)

Required Attendees: Hinkley, Richard Dale (Police Department (LUPD)); Sloan, Ronald Thomas; Lamb, Scott; Liberty University Legal Affairs

Resources: Suite 2730 Legal Affairs Conference Room

Please bring all documents again.

Thank you.

Lamb Rule 41
Exhibit 10(i)

From: Hammonds, Sandra Gail (Legal Affairs) <sghammonds@liberty.edu>
Sent: Thursday, April 22, 2021 7:39 AM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: RE: Meeting request

Hi Scott,

I scheduled a 30-minute meeting for tomorrow at 3 pm. If you think more time is needed, please let me know and I will update.

Thanks.

Sandra Hammonds
Executive Assistant & Office Administrator
Office of Legal Affairs

(434) 592-7797

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From: Lamb, Scott <scottlamb@liberty.edu>
Sent: Wednesday, April 21, 2021 5:30 PM
To: Hammonds, Sandra Gail (Legal Affairs) <sghammonds@liberty.edu>
Cc: Corry, David M (Legal Affairs) <dcorry@liberty.edu>
Subject: Meeting request

Sandra:

Would you please schedule a meeting for Mr. Corry, Richard Hinkley, and Ron Sloan?

To discuss the documents pertaining to the [REDACTED] case. And if they could, please bring all those documents again.

Thank you,
-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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Lamb Rule 41
Exhibit 10(j)

Subject: Discuss Documents re: [REDACTED] Case

Location: Suite 2730 Legal Affairs Conference Room

Start: 4/23/2021 3:00 PM

End: 4/23/2021 4:00 PM

Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Corry, David M (Legal Affairs)

Required Attendees: Hinkley, Richard Dale (Police Department (LUPD)); Sloan, Ronald Thomas; Lamb, Scott; Liberty University Legal Affairs

Resources: Suite 2730 Legal Affairs Conference Room

Please bring all documents again.

Thank you.

Lamb Rule 41
Exhibit 10(k)

From: [REDACTED]
Sent: Friday, April 23, 2021 8:46 AM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: [External] Re: FERPA form
Attach: [REDACTED]

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Scott,

Signed FERPA is attached. I do not recall my student number but police records/reports and other documents are able to be located under my maiden name [REDACTED]

Thank you

On Thu, Apr 22, 2021 at 6:43 PM Lamb, Scott <scottlamb@liberty.edu> wrote:

[REDACTED]
I have attached our standard "FERPA Release Form" that you can fill out and return to me.

I am told that we have your signature on file from 2007, so I do not believe it will be necessary for you to have this form notarized.

As you fill out this form, please know that you have my word that there is no "secret handshake" that you need to know in order to have access to the files. There is no special name or categorization that your files have....and that if you don't use that special name then I won't tell you about the files or let you access them. That's not the way I operate and that's not the way this will proceed.

To that end ... On the form, you'll see "Other" – for the type of files you're releasing. Simply initial that and write in: "All files pertaining to the subject matter that Scott Lamb is coordinating with me about."

As I said in the previous email, I do not have authority over the release of any files. And I myself do not have a copy of the files that pertain to you.

However, I will return to you after a brief process of discovery to ascertain:

- (1) What types of files do we have regarding this situation?
- (2) Do any policies exist that would keep a person from accessing files that pertain to them?
- (3) Is redacting legally required, given that there are other names on the files?
- (4) If redacting is legally required, would [REDACTED] and/or someone she authorizes in her stead be allowed to see the original, unredacted files – in addition to receiving the redacted ones?

I do not know the answers to these questions. But you have my word that there will be transparency in my answers back to you.

Feel free to call if you have any questions or concerns. My cell is listed below.

All the best,
-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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Lamb Rule 41
Exhibit 10(1)

LU004061

Student ID# _____

Student's Name _____

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REGISTRAR

FR

1971 University Blvd. Lynchburg, VA 24515-2269

Phone 434-592-5100 Fax 434-582-2187

FERPA Release Form

It is the policy of Liberty University, in accordance with the Family Educational Rights and Privacy Act (FERPA), to withhold personally identifiable information contained in our students' educational records unless the student has consented to disclosure or FERPA allows disclosure. Information, such as name and address, may be disclosed to the public. However, private information, such as grades, class schedules, the student's account, and financial aid awards may not be released or discussed without express consent from the student.

Signing this form provides such consent, according to the information designated for release and to whom it is to be released.

I, _____, Student ID Number _____, authorize Liberty University to release the following educational records, upon request, to the persons listed below, for the purpose of keeping them informed regarding my education at Liberty University.

Please initial all that apply:

_____ All financial records in the Student Accounts Office.

_____ All Financial Aid information.

_____ All academic records.

_____ Other All files pertaining to the subject matter that Scott Lamb is coordinating with me about

Persons to whom information may be released:

Name: Julie Roys

Name: _____

Name: _____

I acknowledge by my signature that I understand that, although I am not required to release my records, I am giving my consent to release the designated information to the above named person(s). I understand that this release will remain in effect unless I revoke such consent in writing and the revocation is received and processed by Liberty University.

Signature: _____

Date: 4-22-21

5/2007

White – Registrar's Office

Yellow – Financial Aid

Pink – Student Accounts

LU004062

From: Julie Roys <julie@julieroys.com>
Sent: Friday, April 23, 2021 7:19 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: [External] Re: Group call?

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hey Scott,

Can you call me?

Sent from my iPhone

On Apr 23, 2021, at 5:00 PM, Lamb, Scott <scottlamb@liberty.edu> wrote:

(Feel free to record the call)

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

<ATT00001.png>

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On Apr 23, 2021, at 5:58 PM, Scott Lamb <scottlamb@liberty.edu> wrote:

██████ and Julie:

Could we jump on a 3-way call?

-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

<ATT00002.png>

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From: [REDACTED]
Sent: Friday, April 23, 2021 11:38 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Cc: [REDACTED]
Subject: [External] FERPA Form - [REDACTED]
Attach: FERPA-[REDACTED].pdf

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Please find the attached FERPA form to release (to [REDACTED] and Julie) any and all documentation with my name concerning the information you are coordinating with [REDACTED] on.

Thank you,
[REDACTED]

Student ID# [REDACTED]
Student's Name _____

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REGISTRAR

FR

1971 University Blvd. Lynchburg, VA 24515-2269
Phone 434-592-5100 Fax 434-582-2187

FERPA Release Form

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Signing this form provides such consent, according to the information designated for release and to whom it is to be released.

I, [REDACTED], Student ID Number [REDACTED], authorize Liberty University to release the following educational records, upon request, to the persons listed below, for the purpose of keeping them informed regarding my education at Liberty University.

Please initial all that apply:

- _____ All financial records in the Student Accounts Office.
- _____ All Financial Aid information.
- _____ All academic records.
- X Other All files pertaining to the subject matter that Scott Lamb is coordinating with [REDACTED] about.

 Persons to whom information may be released:

Name: [REDACTED]

Name: Julie Roys

Name: _____

I acknowledge by my signature that I understand that, although I am not required to release my records, I am giving my consent to release the designated information to the above named person(s). I understand that this release will remain in effect unless I revoke such consent in writing and the revocation is received and processed by Liberty University.

Signature: [REDACTED] Date: 4/23/21

From: Julie Roys <julie@julieroys.com>
Sent: Saturday, April 24, 2021 8:33 AM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: [External] Address

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Please send [REDACTED] police report and student file to me at:

[REDACTED]

Thanks!
Julie

--
THE
ROYS  
REPORT
[Website/Facebook/Twitter](#)

From: [REDACTED]
Sent: Monday, April 26, 2021 10:22 AM
To: Lamb, Scott <scottlamb@liberty.edu>
Cc: [REDACTED]
Subject: Re: [External] FERPA Form - CW

Scott, please send those directly to myself:
[REDACTED]

On Apr 26, 2021, at 10:19 AM, Lamb, Scott <scottlamb@liberty.edu> wrote:

Got it. Will do.

We will need your mailing address for the documents.

From what I understand, there will be 2 shipments (2 different documents), one from LUPD and one from our General Counsel.

The first should be in the mail by the end of this week. The second should be within a week or two.

All the best,
-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

<ATT00001.png>

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On Apr 23, 2021, at 11:37 PM, [REDACTED] wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Please find the attached FERPA form to release (to [REDACTED] and Julie) any and all documentation with my name concerning the information you are coordinating with [REDACTED] on.

Thank you,
[REDACTED]

From: [REDACTED]
Sent: Monday, April 26, 2021 12:28 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] FERPA Form - [REDACTED]

Scott,

I would like to request to pick up both documents this Friday, April 30th. After having received [REDACTED] FERPA, a week should be plenty of time to gather documents for delivery. I understand I may have to receive those from separate offices - LUPD and the office of legal affairs. Please facilitate coordinating those documents for pick up.

Thank you

On Apr 26, 2021, at 10:19 AM, Lamb, Scott <scottlamb@liberty.edu> wrote:

Got it. Will do.

We will need your mailing address for the documents.

From what I understand, there will be 2 shipments (2 different documents), one from LUPD and one from our General Counsel.

The first should be in the mail by the end of this week. The second should be within a week or two.

All the best,
-Scott

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Office (434) 592-6836

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On Apr 23, 2021, at 11:37 PM, [REDACTED] wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Please find the attached FERPA form to release (to [REDACTED] and Julie) any and all documentation with my name concerning the information you are coordinating with [REDACTED] on.

Thank you,
[REDACTED]

From: Julie Roys <julie@julieroys.com>
Sent: Monday, April 26, 2021 12:29 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] Address

One other thing... I have confirmed that [REDACTED] sent in her FERPA form on Friday night. It's my understanding, per our conversation Friday, that having the FERPA from her was the only impediment to sending the student file immediately. Given this information, can you explain why it might take up to two weeks to get [REDACTED] file ready to send? Forgive me for feeling this way, but I fear the file is being sanitized.

Thanks,
Julie

On Mon, Apr 26, 2021 at 10:02 AM Julie Roys <julie@julieroys.com> wrote:
I appreciate that. Thank you!

On Mon, Apr 26, 2021 at 10:01 AM Lamb, Scott <scottlamb@liberty.edu> wrote:
Yes.

It still won't come from me directly, but I will give this directive to those who will send them out.

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 26, 2021, at 10:47 AM, Julie Roys <julie@julieroys.com> wrote:

Understood. As soon as each is ready, would you please have them overnighted to me?

Thanks,
Julie

On Mon, Apr 26, 2021 at 9:40 AM Lamb, Scott <scottlamb@liberty.edu> wrote:
Two things in play here:

- 1) I am not in control of the timing. If I were, I'd be happy to send them today, and overnight them.
- 2) The timing is a matter of them (Bucket B at least) needing to be prepared. The "Bucket B" documents have not been previously prepared/redacted by our General Counsel.

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 26, 2021, at 10:36 AM, Julie Roys <julie@julieroys.com> wrote:

Scott,

That's really a long time. Would you please overnight the documents to me this week? I am happy to pay shipping.

Thanks,
Julie

On Mon, Apr 26, 2021 at 9:21 AM Lamb, Scott <scottlamb@liberty.edu> wrote:

Lamb Rule 41
Exhibit 10(r)

LU004077

Got it.

From what I understand, there will be 2 shipments (2 different documents), one from LUPD and one from our General Counsel.

The first should be in the mail by the end of this week. The second should be within a week or two.

All the best,
-Scott

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Senior Vice President of Communications and Public Engagement

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Office (434) 592-6836

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On Apr 24, 2021, at 8:33 AM, Julie Roys <julie@julieroys.com> wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Please send [REDACTED] police report and student file to me at:

[REDACTED]

Thanks!
Julie

-

From: [REDACTED]
Sent: Monday, April 26, 2021 1:15 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] FERPA Form - [REDACTED]

The earlier the better. I am unavailable 1pm-3pm.. Just wanting to confirm it's both sets of documents.

On Apr 26, 2021, at 12:57 PM, Lamb, Scott <scottlamb@liberty.edu> wrote:

Sounds good. What time can you meet?

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 26, 2021, at 12:27 PM, [REDACTED] wrote:

Scott,

I would like to request to pick up both documents this Friday, April 30th. After having received [REDACTED] FERPA, a week should be plenty of time to gather documents for delivery. I understand I may have to receive those from separate offices - LUPD and the office of legal affairs. Please facilitate coordinating those documents for pick up.

Thank you

On Apr 26, 2021, at 10:19 AM, Lamb, Scott <scottlamb@liberty.edu> wrote:

Got it. Will do.

We will need your mailing address for the documents.

From what I understand, there will be 2 shipments (2 different documents), one from LUPD and one from our General Counsel.

The first should be in the mail by the end of this week. The second should be within a week or two.

All the best,
-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 23, 2021, at 11:37 PM, [REDACTED] wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Please find the attached FERPA form to release (to [REDACTED] and Julie) any and all documentation with my name concerning the information you are coordinating with [REDACTED] on.

Thank you,
[REDACTED]

From: [REDACTED]
Sent: Monday, April 26, 2021 2:11 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] FERPA Form - [REDACTED]

Thank you. Does 9am work?

On Apr 26, 2021, at 1:54 PM, Lamb, Scott <scottlamb@liberty.edu> wrote:

Yes, that's correct.

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 26, 2021, at 1:14 PM, [REDACTED] wrote:

The earlier the better. I am unavailable 1pm-3pm.. Just wanting to confirm it's both sets of documents.

On Apr 26, 2021, at 12:57 PM, Lamb, Scott <scottlamb@liberty.edu> wrote:

Sounds good. What time can you meet?

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 26, 2021, at 12:27 PM, [REDACTED] wrote:

Scott,

I would like to request to pick up both documents this Friday, April 30th. After having received [REDACTED] FERPA, a week should be plenty of time to gather documents for delivery. I understand I may have to receive those from separate offices - LUPD and the office of legal affairs. Please facilitate coordinating those documents for pick up.

Thank you

On Apr 26, 2021, at 10:19 AM, Lamb, Scott <scottlamb@liberty.edu> wrote:

Got it. Will do.

We will need your mailing address for the documents.

From what I understand, there will be 2 shipments (2 different documents), one from LUPD and one from our General Counsel.

The first should be in the mail by the end of this week. The second should be within a week or two.

All the best,
-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

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Office (434) 592-6836

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Lamb Rule 41
Exhibit 10(t)

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On Apr 23, 2021, at 11:37 PM, [REDACTED] wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Please find the attached FERPA form to release (to [REDACTED] and Julie) any and all documentation with my name concerning the information you are coordinating with [REDACTED] on.

Thank you,
[REDACTED]

From: [REDACTED]
Sent: Monday, April 26, 2021 6:18 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] FERPA Form - [REDACTED]

Ok. Friday, 9am at Hancock. Thank you

On Mon, Apr 26, 2021 at 3:32 PM Lamb, Scott <scottlamb@liberty.edu> wrote:

That works for me.

Let's meet at the Hancock Welcome Center. Very easy to find and always ample parking.

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 26, 2021, at 2:10 PM, [REDACTED] wrote:

Thank you. Does 9am work?

On Apr 26, 2021, at 1:54 PM, Lamb, Scott <scottlamb@liberty.edu> wrote:

Yes, that's correct.

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 26, 2021, at 1:14 PM, [REDACTED] wrote:

The earlier the better. I am unavailable 1pm-3pm.. Just wanting to confirm it's both sets of documents.

On Apr 26, 2021, at 12:57 PM, Lamb, Scott <scottlamb@liberty.edu> wrote:

Sounds good. What time can you meet?

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 26, 2021, at 12:27 PM, [REDACTED] wrote:

Scott,

I would like to request to pick up both documents this Friday, April 30th. After having received [REDACTED] FERPA, a week should be plenty of time to gather documents for delivery. I understand I may have to receive those from separate offices - LUPD and the office of legal affairs. Please facilitate

Lamb Rule 41
Exhibit 10(u)

LU004089

coordinating those documents for pick up.

Thank you

On Apr 26, 2021, at 10:19 AM, Lamb, Scott <scottlamb@liberty.edu> wrote:

Got it. Will do.

We will need your mailing address for the documents.

From what I understand, there will be 2 shipments (2 different documents), one from LUPD and one from our General Counsel.

The first should be in the mail by the end of this week. The second should be within a week or two.

All the best,
-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

<ATT00001.png>

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On Apr 23, 2021, at 11:37 PM, [REDACTED] wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Please find the attached FERPA form to release (to [REDACTED] and Julie) any and all documentation with my name concerning the information you are coordinating with [REDACTED] on.

Thank you,
[REDACTED]

Subject: Declined: Meet [REDACTED] at Hancock Center to hand off documents

Location: Hancock Welcome Center (1971 University Blvd, Lynchburg, VA 24515, United States)

Start: 4/30/2021 9:00 AM

End: 4/30/2021 9:30 AM

Show Time As: Busy

Recurrence: (none)

Organizer: Sloan, Ronald Thomas

Required Attendees: Lamb, Scott

Resources: Hancock Welcome Center (1971 University Blvd, Lynchburg, VA 24515, United States)

Lamb Rule 41
Exhibit 10(v)

Subject: Declined: Meet [REDACTED] at Hancock Center to hand off documents

Location: Hancock Welcome Center (1971 University Blvd, Lynchburg, VA 24515, United States)

Start: 4/30/2021 9:00 AM

End: 4/30/2021 9:30 AM

Show Time As: Busy

Recurrence: (none)

Organizer: Hinkley, Richard Dale (Police Department (LUPD))

Required Attendees: Lamb, Scott

Resources: Hancock Welcome Center (1971 University Blvd, Lynchburg, VA 24515, United States)

Lamb Rule 41
Exhibit 10(w)

From: Julie Roys <julie@julieroys.com>
Sent: Wednesday, April 28, 2021 12:36 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] Questions concerning 2005 gang rape
Attach: Questions for Liberty University UPDATED.docx

Scott,

I've attached an updated list of questions, which reflects the information in the documents you sent Friday.

My initial questions were sent more than a month ago and I would appreciate answers by the end of this week. Would you be able to produce those by then? I can understand if the updated questions might take a bit longer, but I would think a month is more than enough time to answer the questions I sent previously.

Thank you,
Julie

On Thu, Apr 15, 2021 at 3:54 PM Julie Roys <julie@julieroys.com> wrote:

Scott,

Sorry I didn't respond earlier to your voicemail. I am holding and awaiting LU's response to the questions next week.

Thanks!
Julie

On Tue, Apr 6, 2021 at 10:55 AM Julie Roys <julie@julieroys.com> wrote:

Sure. Thanks for the update.

On Tue, Apr 6, 2021 at 9:45 AM Lamb, Scott <scottlamb@liberty.edu> wrote:

Folks have been out (Easter and Spring Break).

Let me see what they're prepared to do this week.

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 6, 2021, at 10:26 AM, Julie Roys <julie@julieroys.com> wrote:

Hi Scott,

Reaching out one last time. Are you planning on responding to my detailed questions? If so, would you please let me know when I should expect them?

Thank you,
Julie

On Thu, Apr 1, 2021 at 12:11 PM Julie Roys <julie@julieroys.com> wrote:

Scott,

Can you have these answers to me by end of the day Monday?

Thanks,
Julie

On Fri, Mar 26, 2021 at 7:15 PM Lamb, Scott <scottlamb@liberty.edu> wrote:

We are working on this. -Scott

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From: Julie Roys <julie@julieroys.com>
Sent: Tuesday, March 23, 2021 5:13:39 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: [External] Questions concerning 2005 gang rape

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Thanks for taking my call the other day. Attached are detailed questions for LU, several employees, and Jonathan Falwell concerning the 2005 alleged gang rape of [REDACTED]

[REDACTED] case resulted in the 2013 settlement between Liberty and the U.S. Dept of Education for Liberty's failure to comply with federal campus crime and security reporting requirements. However, it appears that because of a technicality, Liberty was able to avoid reporting that [REDACTED] was gang raped in 2005. Instead, the school was fined for not classifying the incident as an "Aggravated Assault, at a minimum."

[REDACTED] story raises many issues about Liberty's reporting of crimes and care for victims. The victim also is upset that Jonathan Falwell allegedly promised that her case would be part of the third-party investigation Liberty is conducting, but it's not.

I would prefer to have actual conversations with sources concerning these issues. If that is possible, please let me know.

Thank you,
Julie Roys

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Questions for Liberty University & LU employees/trustee regarding the alleged gang rape of [REDACTED] on April 13, 2005:

- **For Mark Hine, Dave Young:** According to a witness and emails, you were told about [REDACTED] rape in 2005 and Clery Act violations regarding reporting her rape. (One email says [REDACTED] and her roommate talked to Young “quite a bit.”)
 - What actions did you take to rectify LU’s failure to report the rape?
 - What did you do to insure that [REDACTED] was cared for? Counseling, etc...?
 - [REDACTED] and her roommate requested cameras, better lighting, etc... to be installed in the tunnel that leads to and from East Campus, where the rape occurred. Why was this not done immediately?
- **For Jonathan Falwell:**
 - You were copied on the same emails Mark Hine & Dave Young received in 2005. Yet, when you met with [REDACTED] Karen Swallow Prior, and [REDACTED] in September, you reportedly said you had never heard about [REDACTED] 2005 gang rape. Can you explain?
 - Also, you reportedly promised [REDACTED] that LU’s investigation would include her case—that she’d “have a seat at the table.” Yet that hasn’t happened. Would you tell me why this happened?
 - Is Jerry Falwell, Jr., still on the board at Thomas Road Baptist Church?
- **For Liberty U:**

Background:

The Clery Act Fine Letter dated April 3, 2013 states (bold-face is mine):

“(A) female student was attacked by 3 males as she exited the pedestrian tunnel . . . The victim reported the attack the same day to LUPD, and provided a **written report on April 18, 2005** to LUPD. According to the victim’s written report to LUPD, the attackers used ‘a wooden type stick.’ . . . In **May 2005**, the victim again contacted LUPD and stated that she had been **sexually assaulted**. Liberty did not disclose the April 13, 2005 aggravated assault incident in its 2005 crime statistics. In its response,

Liberty argues that the April 2005 incident was not included in its calendar year 2005 crime statistics because “there was never a report made at all that complainant was sexually assaulted or raped in April 2005.” *(This may technically be true because assailant reported the sexual assault component of the April 13, 2005, attack in May 2005.)*

The letter further states: “In **May 2005**, the victim again contacted LUPD and stated that she had been **gang-raped** by the same perpetrators that had previously sexually assaulted her. . .

“Liberty did not provide the Department with a legal or factual basis for not issuing a timely warning about the two sexual assaults reported to LUPD on February 20, 2005; the April 13, 2005 aggravated assault; and the alleged **gang-rape** reported by the same victim to LUPD in **May 2005**.” *(In talking to the Clery Investigator, it seems apparent that the DOE letter erred in this statement. The victim’s statement in May 2005 concerned the gang rape in April 2005, not a separate assault in May.)*

Similarly, the **March 23, 2010, DOE Program Review/FRPD** states:

“In **May 2005**, the complainant again contacted LUPD and stated that she was **sexually assaulted**. This report is documented in LUPD Lt. Jennifer Jones’ supplemental report dated May 20, 2005. . . .

“About a month later (after April 13 incident), the victim did state that she was **gang-raped** by the same men.”

Questions:

1. The victim has repeatedly requested all the LUPD reports regarding her her assaults in 2005. Yet in all the documents she’s received from LUPD, two items are clearly missing. One is the **April 18, 2005, written report** that the victim gave LUPD. The second is the **May 2005 report** that the victim made, which stated that her April 2005 assault had been a “sexual assault” and “gang rape.” Why has the April 18, 2005, written report and the May 2005 report not been supplied to the victim? Would LUPD please release both items now?

Though the "Settlement Agreement" says that the evidence does not indicate that Liberty received a report of sexual assault in May, 2005, can you explain why the FPRD gives such specificity about a May report? It gives a date: "This report is documented in LUPD Lt. Jennifer Jones' supplemental report dated May 20, 2005." It speaks of the victim being "gang-raped" and that "there were other victims, one of whom she believed to be a Liberty student."

It also says that LUPD records "indicate there were inquiries by other Liberty officials, requests for the production of evidence, including clothing . . ." Could it be that the May 20 document indicating a gang rape was not a police report, but other documentation, such as an email or notes from a conversation with an LU official?

2. Given what the victim reported on April 18, 2005, would you please explain why Liberty contended in an email to the News & Advance, "There is no indication that the attack was conducted with the purpose of inflicting severe bodily harm."

Also, does LU still dispute the DOE's findings and not admit any "liability or wrongdoing"?

3. Also, given that the victim reported that she was gang raped, why has Liberty not reported this fact? (LU's 2005 Crime Statistics still does not mention a forcible sex offense on campus or an aggravated assault on campus.)

In addition to the FRPD statement about a May report, I have emails from 2005 showing that LU officials knew [REDACTED] claimed to have been raped. According to the Clery Act, LU must report any claim of sexual assault. To date, this alleged crime has never been reported by LU. Can you explain why LU has not reported the sexual assault?

4. Can you explain why LU did not provide professional, outside counseling for [REDACTED] after her alleged gang rape?

5. Why did LUPD not turn [REDACTED] gang rape on April 13, 2005, over to Lynchburg PD as is their normal practice?
6. Why was no one charged with [REDACTED] rape, given that she identified one of her attackers and had previously alleged an attack by him? [REDACTED] also had reported the alleged rapist earlier for stalking her.

- **For Laura Wallace:**

- According to Mark Tinsley, a former LU dean, Laura Wallace called him sometime between 2000—2003, when he was a LUPD officer, and urged him to drop charges against a minor and an adult whom Tinsley arrested for being “drunk in public.” (Tinsley said LUPD Chief Randy Smith told him that the two people charged were friends of an influential pastor.) Tinsley says he told Wallace that he would not drop the charges and that her request was illegal. Tinsley says Wallace then got angry and hung up. Tinsley adds that Randy Smith took control of the matter and dropped the charges against the two alleged offenders. I would like to hear Wallace’s side of the story.
- When did Wallace become the administrator that LUPD reported to?
- When did oversight for LUPD pass from Wallace to Ron Sloan

- **For Liberty U:**

- Tinsley says he was called for a rape in progress on October 7, 2002. Tinsley says this was the rape for which [REDACTED] was later found to be the suspect. Tinsley says he responded to the alleged scene of the rape, but no one was there. Even so, Tinsley said he wrote a report of the alleged crime. I requested Tinsley’s report from LUPD, but LUPD says it has no report of the alleged rape. Would you please explain why that is?

From: Jenkins, Robin E (Legal Affairs) <rjenkins22@liberty.edu>
Sent: Friday, April 30, 2021 8:17 AM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: [REDACTED]
Attach: Ltr - [REDACTED] - OUT re FERPA (Jenkins) 4-30-21.docx.pdf

Scott,

Attached is a letter that is part of the packet of documents being hand-delivered to [REDACTED] Thank you.

Robin E. Jenkins
Associate Counsel
Office of Legal Affairs

(434) 592-7062

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Lamb Rule 41
Exhibit 10(y)

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OFFICE OF LEGAL AFFAIRS

April 30, 2021

Hand-delivered



RE: Release of records under the Family Educational Rights and Privacy Act (FERPA)

Dear [REDACTED]

With [REDACTED] consent, Liberty University is disclosing/releasing information to you from [REDACTED] education record. In compliance with FERPA, this disclosure/release is made on condition that you will not disclose [REDACTED] information to any other party without [REDACTED] consent.

Sincerely,

A handwritten signature in black ink that reads "Robin E. Jenkins".

Robin E. Jenkins
Associate Counsel

Cc: Scott Lamb, Senior Vice President – Communications/Public Engagement, David Corry, General Counsel, [REDACTED]

1971 University Blvd.
Green Hall, Suite 2730
Lynchburg, VA 24515

Phone: (434) 592-7200
Fax: (434) 582-3871

LegalAffairs@Liberty.edu
Liberty.edu

From: Julie Roys <julie@julieroys.com>
Sent: Friday, April 30, 2021 10:00 AM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: [External] Re: MEDIA INQUIRY: [REDACTED]
Attach: ATT00001.png

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

[REDACTED] said she received 3 copies of her student file, not her police report. Just to clarify... Is Liberty overnighing the student file to me or does [REDACTED] need to do that?

Thanks,
Julie

On Wed, Apr 28, 2021 at 12:22 PM Lamb, Scott <scottlamb@liberty.edu> wrote:

Julie:

You are lined up to receive the reports and those contain new information core to your understanding of these events. It would be premature for us to answer these questions ahead of your obtaining and reviewing these documents.

Also, please note that it is [REDACTED] herself who will send the LUPD document to you ("Bucket A") – not Liberty University. She will be receiving three copies of that report, as I've asked that we go ahead and make 3 copies, to expedite her sending them to the two people on her FERPA, you and [REDACTED]. But we are not allowed to send the police report to you and [REDACTED] directly, even with the FERPA.

All the best,
-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836



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On Apr 28, 2021, at 12:35 PM, Julie Roys <julie@julieroys.com> wrote:

Scott,

I've attached an updated list of questions, which reflects the information in the documents you sent Friday.

My initial questions were sent more than a month ago and I would appreciate answers by the end of this week. Would you be able to produce those by then? I can understand if the updated questions might take a bit longer, but I would think a month is more than enough time to answer the questions I sent previously.

Thank you,
Julie

On Thu, Apr 15, 2021 at 3:54 PM Julie Roys <julie@julieroys.com> wrote:

Scott,

Sorry I didn't respond earlier to your voicemail. I am holding and awaiting LU's response to the questions next week.

Thanks!
Julie

On Tue, Apr 6, 2021 at 10:55 AM Julie Roys <julie@julieroys.com> wrote:
Sure. Thanks for the update.

On Tue, Apr 6, 2021 at 9:45 AM Lamb, Scott <scottlamb@liberty.edu> wrote:
Folks have been out (Easter and Spring Break).

Let me see what they're prepared to do this week.

Lamb Rule 41
Exhibit 10(z)

LU004110

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
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On Apr 6, 2021, at 10:26 AM, Julie Roys <julie@julieroys.com> wrote:

Hi Scott,

Reaching out one last time. Are you planning on responding to my detailed questions? If so, would you please let me know when I should expect them?

Thank you,
Julie

On Thu, Apr 1, 2021 at 12:11 PM Julie Roys <julie@julieroys.com> wrote:

Scott,
Can you have these answers to me by end of the day Monday?

Thanks,
Julie

On Fri, Mar 26, 2021 at 7:15 PM Lamb, Scott <scottlamb@liberty.edu> wrote:

We are working on this. -Scott

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From: Julie Roys <julie@julieroys.com>
Sent: Tuesday, March 23, 2021 5:13:39 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: [External] Questions concerning 2005 gang rape

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Thanks for taking my call the other day. Attached are detailed questions for LU, several employees, and Jonathan Falwell concerning the 2005 alleged gang rape of [REDACTED]

[REDACTED] case resulted in the 2013 settlement between Liberty and the U.S. Dept of Education for Liberty's failure to comply with federal campus crime and security reporting requirements. However, it appears that because of a technicality, Liberty was able to avoid reporting that [REDACTED] was gang raped in 2005. Instead, the school was fined for not classifying the incident as an "Aggravated Assault, at a minimum."

[REDACTED] story raises many issues about Liberty's reporting of crimes and care for victims. The victim also is upset that Jonathan Falwell allegedly promised that her case would be part of the third-party investigation Liberty is conducting, but it's not.

I would prefer to have actual conversations with sources concerning these issues. If that is possible, please let me know.

Thank you,
Julie Roys

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From: Corry, David M (Legal Affairs) <dcorry@liberty.edu>
Sent: Tuesday, May 4, 2021 8:53 AM
To: Julie Roys <julie@julieroys.com>
Cc: Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] Re: [REDACTED] - Media Request

No, Julie. You do not have my consent to record our discussion. The discussion is off the record for background purposes only.

David Corry

Sent from my iPhone

On May 3, 2021, at 10:58 PM, Julie Roys <julie@julieroys.com> wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi David,

I would like to conduct this interview over a third-party platform. Also, may I have your permission to record our interview?

Here's a Zoom link:

Topic: Interview with David Correy
Time: May 5, 2021 09:00 AM Central Time (US and Canada)

Join Zoom Meeting
<https://us02web.zoom.us/j/3674854556?pwd=QmRISXo0dGpSb2RabTYzZFR3dzd4QT09>

Meeting ID: 367 485 4556
Passcode: 8H8TTn

On Mon, May 3, 2021 at 11:49 AM Corry, David M (Legal Affairs) <dcorry@liberty.edu> wrote:

-- Do not delete or change any of the following text. --

When it's time, join your Webex meeting here.

Join meeting

More ways to join:

Join from the meeting link
<https://libertyu.webex.com/libertyu/j.php?MTID=ma7387daf2373127d32feccbc8c0de2a2>

Join by meeting number
Meeting number (access code): 132 784 3419
Meeting password: 3dkZg3vBW6Z

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Join by phone

Lamb Rule 41
Exhibit 10(aa)

LU004118

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You can also dial 173.243.2.68 and enter your meeting number.

Join using Microsoft Lync or Microsoft Skype for Business
Dial [1327843419.libertyu@lync.webex.com](tel:1327843419)

If you are a host, click [here](#) to view host information.

Need help? Go to <https://help.webex.com>



From: Julie Roys <julie@julieroys.com>
Sent: Tuesday, May 4, 2021 10:03 AM
To: Corry, David M (Legal Affairs) <dcorry@liberty.edu>; Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] Re: [REDACTED] - Media Request

Oh, I was under the impression we were having an on-the-record discussion. So, no one from Liberty is going to speak on-the-record? Will there be a statement?

On Tue, May 4, 2021 at 7:53 AM Corry, David M (Legal Affairs) <dcorry@liberty.edu> wrote:

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Join from the meeting link

<https://libertyu.webex.com/libertyu/j.php?MTID=ma7387daf2373127d32fecbc8c0de2a2>

Join by meeting number

Meeting number (access code): 132 784 3419

Meeting password: 3dkZg3vBW6Z

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Lamb Rule 41
Exhibit 10(ab)

LU004120

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Dial 1327843419.libertyu@lync.webex.com

If you are a host, [click here](#) to view host information.

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From: Corry, David M (Legal Affairs) <dcorry@liberty.edu>
Sent: Tuesday, May 4, 2021 10:07 AM
To: Julie Roys <julie@julieroys.com>; Lamb, Scott <scottlamb@liberty.edu>
Subject: RE: [External] Re: [REDACTED] - Media Request

Julie:

I am sorry for the misunderstanding. After our off the record discussion, we can decide what else may be provided on the record. We just need to be sure you understand all that you already have and what it means first.

David M. Corry
General Counsel

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From: Julie Roys <julie@julieroys.com>
Sent: Tuesday, May 4, 2021 10:03 AM
To: Corry, David M (Legal Affairs) <dcorry@liberty.edu>; Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] Re: [REDACTED] - Media Request

Oh, I was under the impression we were having an on-the-record discussion. So, no one from Liberty is going to speak on-the-record? Will there be a statement?

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David Corry

Sent from my iPhone

On May 3, 2021, at 10:58 PM, Julie Roys <julie@julieroys.com> wrote:

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Here's a Zoom link:

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Meeting ID: 367 485 4556
Passcode: 8H8TTn

On Mon, May 3, 2021 at 11:49 AM Corry, David M (Legal Affairs) <dcorry@liberty.edu> wrote:

-- Do not delete or change any of the following text. --

When it's time, join your Webex meeting here.

Lamb Rule 41
Exhibit 10(ac)

LU004122

Join meeting

More ways to join:

Join from the meeting link

<https://libertyu.webex.com/libertyu/j.php?MTID=ma7387daf2373127d32fecbc8c0de2a2>

Join by meeting number

Meeting number (access code): 132 784 3419

Meeting password: 3dkZg3vBW6Z

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If you are a host, [click here](#) to view host information.

Need help? Go to <https://help.webex.com>



From: Julie Roys <julie@julieroys.com>
Sent: Tuesday, May 4, 2021 11:31 AM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] Re: [REDACTED] - Media Request

I'm happy to have an off-the-record discussion. But what I desire is on-the-record answers to my questions concerning this case and the people involved. I hope I will get at least something I can use tomorrow.

On Tue, May 4, 2021 at 10:29 AM Lamb, Scott <scottlamb@liberty.edu> wrote:

Julie:

I'm sorry for the misunderstanding. I thought I had coached this process as an off-the-record conversation being the first step. ...and that we'd go from there.

Are you still desiring an off-the-record conversation for background purposes?

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On May 4, 2021, at 10:06 AM, David M Corry <dcorry@liberty.edu> wrote:

Julie:

I am sorry for the misunderstanding. After our off the record discussion, we can decide what else may be provided on the record. We just need to be sure you understand all that you already have and what it means first.

David M. Corry
General Counsel

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From: Julie Roys <julie@julieroys.com>
Sent: Tuesday, May 4, 2021 10:03 AM
To: Corry, David M (Legal Affairs) <dcorry@liberty.edu>; Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] Re: [REDACTED] - Media Request

Oh, I was under the impression we were having an on-the-record discussion. So, no one from Liberty is going to speak on-the-record? Will there be a statement?

On Tue, May 4, 2021 at 7:53 AM Corry, David M (Legal Affairs) <dcorry@liberty.edu> wrote:

No, Julie. You do not have my consent to record our discussion. The discussion is off the record for background purposes only.

David Corry

Lamb Rule 41
Exhibit 10(ad)

LU004125

Sent from my iPhone

On May 3, 2021, at 10:58 PM, Julie Roys <julie@julieroys.com> wrote:

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Hi David,

I would like to conduct this interview over a third-party platform. Also, may I have your permission to record our interview?

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Meeting ID: 367 485 4556
Passcode: 8H8TTn

On Mon, May 3, 2021 at 11:49 AM Corry, David M (Legal Affairs) <dcorry@liberty.edu> wrote:

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<https://libertyu.webex.com/libertyu/j.php?MTID=ma7387daf2373127d32fecbc8c0de2a2>

Join by meeting number

Meeting number (access code): 132 784 3419

Meeting password: 3dkZg3vBW6Z

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From: Corry, David M (Legal Affairs) <dcorry@liberty.edu>
Sent: Tuesday, May 4, 2021 11:39 AM
To: Julie Roys <julie@julieroys.com>
Cc: Lamb, Scott <scottlamb@liberty.edu>
Subject: RE: [External] Re: [REDACTED] - Media Request

I am comfortable with Zoom. Scott Lamb should be part of the meeting so he can understand what you learn and become educated himself.

David M. Corry
General Counsel

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From: Julie Roys <julie@julieroys.com>
Sent: Tuesday, May 4, 2021 11:24 AM
To: Corry, David M (Legal Affairs) <dcorry@liberty.edu>
Subject: Re: [External] Re: [REDACTED] - Media Request

Okay. I understand why some background information would be helpful. I just don't understand why it needs to be off-the-record. But of course, that's your prerogative.

If/when we go on the record, I would like to record. Are you okay with using Zoom? I will change the settings so we are not recording.

On Tue, May 4, 2021 at 9:06 AM Corry, David M (Legal Affairs) <dcorry@liberty.edu> wrote:

Julie:

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From: Julie Roys <julie@julieroys.com>
Sent: Tuesday, May 4, 2021 10:03 AM
To: Corry, David M (Legal Affairs) <dcorry@liberty.edu>; Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] Re: [REDACTED] - Media Request

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David Corry

Sent from my iPhone

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Lamb Rule 41
Exhibit 10(ae)

LU004129

Here's a Zoom link:

Topic: Interview with David Correy

Time: May 5, 2021 09:00 AM Central Time (US and Canada)

Join Zoom Meeting

<https://us02web.zoom.us/j/3674854556?pwd=QmRISXo0dGpSb2RabTYzZFR3dzd4QT09>

Meeting ID: 367 485 4556

Passcode: 8H8TTn

On Mon, May 3, 2021 at 11:49 AM Corry, David M (Legal Affairs) <dcorry@liberty.edu> wrote:

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More ways to join:

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<https://libertyu.webex.com/libertyu/j.php?MTID=ma7387daf2373127d32fecbc8c0de2a2>

Join by meeting number

Meeting number (access code): 132 784 3419

Meeting password: 3dkZg3vBW6Z

Tap to join from a mobile device (attendees only)

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From: Julie Roys <julie@julieroys.com>
Sent: Tuesday, May 4, 2021 11:48 AM
To: Corry, David M (Legal Affairs) <dcorry@liberty.edu>
Cc: Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] Re: [REDACTED] - Media Request

Sounds good. Here's the information for our meeting:

Neal and Julie Roys is inviting you to a scheduled Zoom meeting.
Topic: Interview with David Correy
Time: May 5, 2021 09:00 AM Central Time (US and Canada)
Join Zoom Meeting
<https://us02web.zoom.us/j/3674854556?pwd=QmRlSXo0dGpSb2RabTYzZFR3dzd4QT09>
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Sent from my iPhone

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|

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From: Corry, David M (Legal Affairs) <dcorry@liberty.edu>
Sent: Wednesday, May 5, 2021 4:27 PM
To: Julie Roys <julie@julieroys.com>
Cc: Lamb, Scott <scottlamb@liberty.edu>
Subject: RE: [External] Re: [REDACTED] - Media Request

Julie:

Give me a call on the TRBC Board question when you have a chance. (434) 5923366.

David M. Corry
General Counsel

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From: Julie Roys <julie@julieroys.com>
Sent: Monday, May 3, 2021 10:59 PM
To: Corry, David M (Legal Affairs) <dcorry@liberty.edu>
Subject: [External] Re: [REDACTED] - Media Request

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Passcode: 8H8TTn

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<https://libertyu.webex.com/libertyu/j.php?MTID=ma7387daf2373127d32fecbcb8c0de2a2>

Join by meeting number
Meeting number (access code): 132 784 3419
Meeting password: 3dkZg3vBW6Z

Lamb Rule 41
Exhibit 10(ag)

LU004136

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Join from a video system or application
Dial [1327843419@libertyu.webex.com](tel:1327843419@libertyu.webex.com)
You can also dial 173.243.2.68 and enter your meeting number.

Join using Microsoft Lync or Microsoft Skype for Business
Dial [1327843419.libertyu@lync.webex.com](tel:1327843419.libertyu@lync.webex.com)

If you are a host, [click here](#) to view host information.

Need help? Go to <https://help.webex.com>



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From: Julie Roys <julie@julieroys.com>
Sent: Thursday, May 6, 2021 1:19 PM
To: Corry, David M (Legal Affairs) <dcorry@liberty.edu>
Cc: Lamb, Scott <scottlamb@liberty.edu>
Subject: [External] Questions
Attach: Final Questions for Liberty University.docx

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi David,

Attached are my questions for Liberty University. If you have any questions or need clarification, please don't hesitate to call.

I would like to have the answers by early next week. Is that doable?

Thank you,
Julie Roys
847-912-2848

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THE
ROYS  
REPORT
[Website/Facebook/Twitter](#)

For Liberty University:

- Given the numerous emails and police reports indicating that [REDACTED] had suffered a sexual assault or rape on April 13, 2005, near a tunnel on Liberty's campus, why did Liberty report zero forcible sexual assaults on campus in the 2005 crime statistics?
 - If LU maintains the assault happened off-campus, would you please explain why this objection was not mentioned in the "Liberty University Position Summary"? Also, please provide information regarding where the public property surrounding the tunnel and path begins.
 - If LU maintains that the April 13, 2005, assault was not forcible sexual assault, would you please explain how you reconcile that with:
 - Police report, [REDACTED] asserts that [REDACTED] did mention "gang rape."
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 - An email from [REDACTED] and [REDACTED] to Jerry Falwell, Sr., (as well as a packet of information) in which they allege that [REDACTED] was raped.
- Why do the 2005 campus crime statistics report only one forcible sexual assault on public property? (Police reports indicate that [REDACTED] was sexually assaulted twice (on Feb. 12 and 13, 2005) on public property. Plus, if LU maintains that the April 13, 2005, sexual assault was not on campus, that would make 3 sexual assaults on public property.)
- Please explain the reporting chain from the LUPD police chief to the LU president in 2005 and now. (Also, can I attribute the information about LU being analogous to a city, with the president being like the mayor and the trustees like the city council?)
- Does LU still admit no "liability or wrongdoing" regarding the handling of [REDACTED] assault on April 13, 2005?

- Why did LUPD not turn ██████ gang rape on April 13, 2005, over to Lynchburg PD as is their normal practice? (Lynchburg PD has no record of the incident.)
- Do you have any explanation for why LUPD has no report of ██████ ██████ rape on Liberty's campus? (Accdg to Lynchburg Police report, rape took place in "field/woods" by 1900 block of University Blvd.)
- Why was no one charged with ██████ assault and/or rape, given that she identified one of her attackers and had previously alleged an attack by him? What was the extent of Liberty's investigation?
- Who on staff was responsible for reporting crime statistics in 2005?
- Can you confirm the following people's employment (or trustee service) at LU with dates employed and titles?
 - Ron Godwin
 - Carol Godwin (Was she ever on staff? What is relation of LU to Liberty Godparent Foundation?)
 - David Young
 - Mark Hine
 - Kathy Rusk
 - Sharon Harless
 - Jennifer Jones
 - LUPD Chief Randy Smith
 - Hope Mink
 - Tim Mink
 - Jonathan Falwell

Who is Ron Brown at the N&A, who's referenced in in Mark Hine's Dec. 14, 2005, email to Jerry Falwell, Jr?

For Laura Wallace:

- According to Mark Tinsley, a former LU dean, Laura Wallace called him sometime between 2000—2003, when he was a LUPD officer, and urged him to drop charges against a minor and an adult whom Tinsley arrested for being "drunk in public." (Tinsley said LUPD Chief Randy Smith told him that the two people charged were friends of an

influential pastor.) Tinsley says he told Wallace that he would not drop the charges and that her request was illegal. Tinsley says Wallace then got angry and hung up. Tinsley adds that Randy Smith took control of the matter and dropped the charges against the two alleged offenders. I would like to hear Wallace's side of the story.

- During what years was Wallace the person to whom the LUPD police chief reported?

For Jonathan Falwell:

- You were copied on the same emails Mark Hine & Dave Young received in 2005. Yet, when you met with [REDACTED], Karen Swallow Prior, and [REDACTED] in September, you reportedly said you had never heard about [REDACTED] 2005 gang rape. Can you explain?
- Also, you reportedly promised [REDACTED] that LU's current investigation would include her case—that she'd "have a seat at the table." Yet that hasn't happened. Would you explain why this happened?

For Dave Young/Mark Hine:

- It's my understanding that [REDACTED] requested professional counseling with someone outside Liberty University. Why, then, did Liberty send [REDACTED] to Carol Godwin for counseling? Also, [REDACTED] maintains that Liberty deceived her about Carol, maintaining that Carol was a professional, outside counselor. Do you have a response to that?
- [REDACTED] and her roommate repeatedly requested cameras, better lighting, etc... to be installed in the tunnel that leads to and from East Campus, where the rape occurred. Why was this not done immediately? What steps were taken to make the campus more safe?
- In an email on June 19, 2005, you write to [REDACTED] that you have been "unable to corroborate" her story that her roommate, [REDACTED] was assaulted by 3 males at the tunnel. You also state that LUPD has no record of what [REDACTED] describes. Given that an assault was documented by police at that time, can you explain your response?

For Professor Jean Tweedy:

- How does Dr. Tweedy respond to the allegations about her in Jennifer (McCafferty) Jones' email to Boyd Rist on May 8, 2005?

From: Corry, David M (Legal Affairs) <dcorry@liberty.edu>
Sent: Thursday, May 6, 2021 3:13 PM
To: Julie Roys <julie@julieroys.com>
Cc: Lamb, Scott <scottlamb@liberty.edu>
Subject: FW: [External] Questions
Attach: Final Questions for Liberty University.docx

Julie:

My day tomorrow is fully booked. I will begin working on this, including seeking authorization for release of statements, as time permits. That will involve a briefing of people who have no background in this matter. That sort of thing has not yet occurred as there was no point in having such a meeting until draft responses have been developed for attribution to Liberty University. I hope your deadline can accommodate the time we will want to invest in responses. If not, I will at least feel better for having provided you a few hours on background.

David M. Corry
General Counsel

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From: Julie Roys <julie@julieroys.com>
Sent: Thursday, May 6, 2021 1:19 PM
To: Corry, David M (Legal Affairs) <dcorry@liberty.edu>
Cc: Lamb, Scott <scottlamb@liberty.edu>
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THE
ROYS  
REPORT
[Website/Facebook/Twitter](#)

Lamb Rule 41
Exhibit 10(ai)

LU004143

For Liberty University:

- Given the numerous emails and police reports indicating that [REDACTED] had suffered a sexual assault or rape on April 13, 2005, near a tunnel on Liberty's campus, why did Liberty report zero forcible sexual assaults on campus in the 2005 crime statistics?
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- Why did LUPD not turn [REDACTED] gang rape on April 13, 2005, over to Lynchburg PD as is their normal practice? (Lynchburg PD has no record of the incident.)
- Do you have any explanation for why LUPD has no report of [REDACTED] [REDACTED] rape on Liberty's campus? (Accdg to Lynchburg Police report, rape took place in "field/woods" by 1900 block of University Blvd.)
- Why was no one charged with [REDACTED] assault and/or rape, given that she identified one of her attackers and had previously alleged an attack by him? What was the extent of Liberty's investigation?
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- During what years was Wallace the person to whom the LUPD police chief reported?

For Jonathan Falwell:

- You were copied on the same emails Mark Hine & Dave Young received in 2005. Yet, when you met with [REDACTED], Karen Swallow Prior, and [REDACTED] in September, you reportedly said you had never heard about [REDACTED] 2005 gang rape. Can you explain?
- Also, you reportedly promised [REDACTED] that LU's current investigation would include her case—that she'd "have a seat at the table." Yet that hasn't happened. Would you explain why this happened?

For Dave Young/Mark Hine:

- It's my understanding that [REDACTED] requested professional counseling with someone outside Liberty University. Why, then, did Liberty send [REDACTED] to Carol Godwin for counseling? Also, [REDACTED] maintains that Liberty deceived her about Carol, maintaining that Carol was a professional, outside counselor. Do you have a response to that?
- [REDACTED] and her roommate repeatedly requested cameras, better lighting, etc... to be installed in the tunnel that leads to and from East Campus, where the rape occurred. Why was this not done immediately? What steps were taken to make the campus more safe?
- In an email on June 19, 2005, you write to [REDACTED] that you have been "unable to corroborate" her story that her roommate, [REDACTED] was assaulted by 3 males at the tunnel. You also state that LUPD has no record of what [REDACTED] describes. Given that an assault was documented by police at that time, can you explain your response?

For Professor Jean Tweedy:

- How does Dr. Tweedy respond to the allegations about her in Jennifer (McCafferty) Jones' email to Boyd Rist on May 8, 2005?

From: Corry, David M (Legal Affairs) <dcorry@liberty.edu>
Sent: Friday, May 14, 2021 4:12 PM
To: Julie Roys <julie@julieroys.com>
Cc: Lamb, Scott <scottlamb@liberty.edu>
Subject: Liberty University Responses to Julie Roys' Questions
Attach: Final Questions for Liberty University (response).docx

Julie:

These are for attribution to a statement from Liberty University, not to me, Scott Lamb, Laura Wallace, Jonathan Falwell, Mark Hine or any other individual.

David M. Corry
General Counsel
Office of Legal Affairs

(434) 592-7200

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Lamb Rule 41
Exhibit 10(aj)

LU004158

LIBERTY UNIVERSITY RESPONSE TO JULIE ROYS' QUESTIONS

All responses in blue are for attribution as "statement(s) provided by Liberty University." Any edits to questions are in [bold brackets].

For Liberty University:

- **ROYS:** Given the numerous emails and police reports indicating that [REDACTED] had suffered a sexual assault or rape on April 13, 2005, near a tunnel on Liberty's campus, why did Liberty report zero forcible sexual assaults on campus in the 2005 crime statistics?
 - If LU maintains the assault happened off-campus, would you please explain why this objection was not mentioned in the "Liberty University Position Summary"? Also, please provide information regarding where the public property surrounding the tunnel and path begins.
 - If LU maintains that the April 13, 2005, assault was not forcible sexual assault, would you please explain how you reconcile that with:
 - Police report, [REDACTED] asserts that [REDACTED] did mention "gang rape."
 - Email from Jennifer Jones saying [REDACTED] reported she was sexually assaulted on campus
 - Numerous emails from [REDACTED] saying [REDACTED] was sexually assaulted or raped
 - An email from [REDACTED] and [REDACTED] to Jerry Falwell, Sr., (as well as a packet of information) in which they allege that [REDACTED] was raped.

LIBERTY UNIVERSITY RESPONSE: While Liberty University received a FERPA waiver to disclose certain student records and while you have apparently been in discussions with those students, FERPA does not permit unlimited disclosures beyond the documents you have in your possession. Liberty University will say that it believes it correctly reported zero forcible sex offenses on its campus in its Clery Act crime report statistics for 2005 because its campus security authorities did not receive a report of a crime

that, in the judgment of its law enforcement professionals, was a forcible sex offense on its campus.

The 2005 LUPD reports which you have been provided show:

- An initial report of an assault that was off-campus.
- Then another assault that was off-campus.
- Then those two assaults off-campus were later said by the female reporter to be sexual assaults off-campus with digital penetration.
- Then, still later, those two assaults off-campus were said by the reporting female to involve sexual intercourse.
- Then the female reporter related to the Residence Life staff that on April 13, 2005 a couple of guys stopped her as she was walking and that they were rough with her and she came back to the dorm with dirty and torn clothes. But to LUPD, the female reporter would provide no details of what happened or where.
- And then later, in a submitted handwritten account for the purposes of obtaining a protective order (but for which the writer would provide no additional details of the incident to LUPD), the female writer said she had been touched while feeling threatened by three males on a Thursday night after spring break while walking through a campus tunnel (assault), and further that she had been sexually fondled three times prior to April 13 by the three males in undetermined locations and unstated dates with no statement as to whether these were forcible or consensual, and that on April 13 (a Wednesday) around 10:10 pm three men (one with a wooden stick) pulled her by her arms from a tunnel exit on campus and dragged to a location off a dirt road by where she tried to escape, was hit on the head and fell into a ditch (likely off-campus) where she was left as her attackers walked away, but with no mention of a sexual assault

occurring on Wednesday April 13 (assault or aggravated assault but not forcible sex offense).

- Also, there was third party hearsay from a roommate that the female assault victim hinted with a head nod at being a victim of a gang rape one of the times she walked home from work around 1:30 am—but without any specific information as to the location of the alleged gang rape or its date (though the dated of the head nod was two days prior to April 13 and the report of the head nod was one day prior to April 13). And neither this hearsay nor the location or date of an alleged gang rape were able to be confirmed by the reported victim.
- Then, over a month later, without providing any additional information on location or date, the female reporter contacted LUPD to report that the men who sexually assaulted her said she was not their only female victim, told her first names of two others, and showed her a photo of one female doing something of a sexual nature.

Any other emails or statements regarding sexual assaults or rapes “on campus” in 2005 were not brought to the attention of a campus security authority and the female reporter was repeatedly unable or unwilling to provide any details that would lead LUPD to conclude that a forcible sex offense had been committed on its campus, nor to even confirm the basic fact that the fondling occurred against the reporter’s will. Other documents with which you have been provided state in various places:

- That the female reporter’s roommate said the reporter was assaulted, sexually assaulted, and raped with no details of the incident(s) but the roommate also concedes the female reporter had not told the truth about the night of April 13. (LU026; LU032)
- As late as February 2006, LUPD Officer Jones replied to the roommate’s request about anything being done about the “assault at

the tunnel” by stating that, “This is the night she has not been clear with me about and I still have yet to get the whole story,” and “[She] never went into any detail with me about that night specifically.” (LU031-LU033)

- An email from the Vice President of Student Affairs in December of 2005, states that he recalls the female reporter stating that she was shoved around and threatened on April 13 but does not recall her ever saying she was raped. (LU201)
- The Vice-Chancellor states in December 2005 that the LUPD Police Chief says that the female reporter never said any sexual assault occurred. (LU201)
- An email from the Executive Assistant for the Vice President for Administration states that this was the first time she had seen any reference to a rape on campus— “the police reports don’t reflect it and I spoke with [the LUPD investigating officer] and she verified [the female reporter] never reported being raped on campus.” (LU208)
- The Commonwealth Attorney was said to have met with the female reporter and her roommate about what happened in the tunnel when the female reporter “was cornered by 3 males at the tunnel. They were able to take her from the tunnel entrance on east campus side and up to the access road above it, where she was assaulted and left. This incident was reported to LUPD, along with Lynchburg police.” Yet still no mention of dates or forcible sexual offense. (LU190-191)

Every attempt by LUPD and LU to verify and uncover details concerning exactly what happened on April 13, whether it was sexual and if so, whether it was forcible, and the location of where any crimes took place in relations to the campus border, were met with silence or conflicting reports, or would constitute rumor or hearsay by another person.

Instead, the female reporter and her roommate quickly pivoted to a campaign to address campus safety, meeting with and writing many high-level campus officials but steadfastly declining to provide the details necessary for campus security officials to conclude that a forcible sex offense had been committed on its campus on any date, nor to even confirm the basic fact the fondling that was reported without a date occurred against the reporter's will.

In short, LU did not treat the April 13, 2005 incident as a reported forcible sex offense on its campus because no such forcible sex offense was reported. This is what was argued by attorneys on behalf of Liberty University to the US Department of Education at both in response to the Clery Act complaint and at the appeal level. In the end, the Department even confirmed that a previous statement concerning Liberty University's failures concerning a report of sexual assault was in error because the University never received such a report.

- **ROYS:** Why do the 2005 campus crime statistics report only one forcible sexual assault on public property? (Police reports indicate that [REDACTED] was sexually assaulted twice (on Feb. 12 and 13, 2005) on public property. Plus, if LU maintains that the April 13, 2005, sexual assault was not on campus, that would make 3 sexual assaults on public property.)

LIBERTY UNIVERSITY RESPONSE: The applicable rules and Handbook for Campus Crime Reporting for 2005 defines "public property" to mean government-owned public streets, sidewalks, and parking facilities on your campus and those intentionally accessible from your campus.

There was only one report of forcible sexual assaults on such public property in 2005.

- **ROYS:** Please explain the reporting chain from the LUPD police chief to the LU president in 2005 and now. (Also, can I attribute the information about LU being analogous to a city, with the president being like the mayor and the trustees like the city council?)

LIBERTY UNIVERSITY RESPONSE: The LUPD Police Chief in 2005 was Randall Smith. He reported to Liberty University's Chancellor and President Jerry Falwell, Sr. Today, LUPD Police Chief Richard Hinkley reports to Vice President for Security and Public Safety Ron Sloan, who in turn reports to Acting President Jerry Prevo.

ROYs: Does LU still admit no "liability or wrongdoing" regarding the handling of [REDACTED] assault on April 13, 2005?

LIBERTY UNIVERSITY RESPONSE: While Liberty University received a FERPA waiver to disclose certain student records and while you have apparently been in discussions with those students, FERPA does not permit unlimited disclosures beyond the documents you have in your possession.

Liberty University is not now in a position to undertake a full investigation of the actions of numerous individuals from over 16 years ago—most of whom are no longer employees—to answer your question and to consider whether some admission of liability or wrongdoing is now in order.

We are content to stand by the terms of the resolution reached with the Department of Education following its investigation of these matters closer to 2005.

In context, the boilerplate language of no admission of liability and wrongdoing by Liberty University pertains to the fact that nothing in the settlement constitutes an admission of the liability and wrongdoing under the Clery Act that was claimed by the Department of Education. That statement remains true today.

Liberty University has already admitted that if the assault on April 13, 2005 was on campus and was an aggravated assault, 1. a failure to report it in the annual security report would have been based on an unintentional coding error that linked the incident with prior incidents involving the same parties as a continuation report when it should have been a separate

incident; 2. a failure to issue a timely warning would have been an error; and 3. a failure to have a separate entry in the crime log would have been an error. Also, Liberty University admitted that while its Annual Security Report for calendar year 2005 was completed timely, it failed to timely send out announcements of its availability with links to where it was on the University's website. No errors should have occurred, and aggressive measures were taken to ensure no future errors.

That said, the Department of Education also acknowledged that Liberty University appropriately responded to the student who provided the April 2005 report, actively investigated the incident, and acted diligently to assist the student following the incident, including offering appropriate support services. Moreover, the Department of Education specifically addressed that nothing in the documents it had, which include all the documents you have, "indicates that Liberty sought to cover-up the alleged incident or intentionally withhold information pertaining to it from students, faculty, staff or the public."

In the end, there was disagreement on whether Liberty University properly characterized and reported for Clery Act purposes a report of a crime occurring in April 2005. However, Liberty University chose to settle unresolved issues with the Department for a substantially reduced fine. Liberty University did what was required under the agreement and considers the matter closed.

- **ROYS:** Why did LUPD not turn [REDACTED] gang rape on April 13, 2005, over to Lynchburg PD as is their normal practice? (Lynchburg PD has no record of the incident.)

LIBERTY UNIVERSITY RESPONSE: First, see prior answers. Second, LUPD never had a normal practice to turn over all on-campus rapes (or even all felonies) to Lynchburg Police Department. It was a case-by-case discussion about whether LUPD had the capabilities to handle the subsequent investigation. Before any such discussion would occur, however, LUPD would need to have concluded that a felony sexual assault occurred on

campus. Third, in 2005 a student victim of sexual assault was given the options of reporting the crime to law enforcement, going to the hospital for the use of a rape kit or doing neither or both. These were victim-controlled decisions. Fourth, the reporter's roommate claims the matter involving a group assault was reported to Lynchburg Police, investigated by them for a few months, and the subject of a meeting with the Lynchburg Commonwealth Attorney at which both she and the female reporter were present. (LU190-LU191; LU214-LU215; LU216)

- **ROYS:** Do you have any explanation for why LUPD has no report of [REDACTED] rape on Liberty's campus? (Accdg to Lynchburg Police report, rape took place in "field/woods" by 1900 block of University Blvd.)

LIBERTY UNIVERSITY RESPONSE: Liberty University had a student by the name of [REDACTED] who attended from August 14, 2000 to October 17, 2002. Based on information released by the Charlottesville Police Department, Liberty University can confirm that this former student is the same person arrested on Wednesday, September 24, 2015 on an abduction charge and subsequently pled guilty to two murders. Liberty University and the Liberty University Police Department fully cooperated with requests for information from other law enforcement agencies in connection with these matters. In light of FERPA, Liberty University was limited in its public responses to inquiries concerning [REDACTED]

It was and is able to say the following: Regarding a report of rape on Liberty University's campus in 2002 and the investigation of it, LUPD maintains certain public records as required by the Clery Act, but such records do not contain the names of the accused or the victims. It maintains a public crime log. In 2002, the log was called the "Criminal Incident Log." What follows is a chart listing the nature, date, time, general location, and disposition of all sex offenses (forcible) reported on Liberty University's campus during 2002.

Date	Time	Area	Description	Disposition
10/17/2002	04:26 hrs.	Behind Vines Center on Spillway	Rape	Report Taken

Liberty University can also state that the October 17, 2002 rape report was handled by the University consistent with its protocol for sexual assault reports. Liberty University's procedure for handling reports of sexual assault involves immediately connecting victims with specialized, trained advocates who are familiar with the process and who inform victims of their rights, assist them through the process (including a hospital visit to gather forensic evidence), and provide answers to their questions. (This procedure was followed in the one rape case reported at Liberty in 2002.)

The October 17, 2002 rape report was investigated by the Lynchburg Police Department, and it is documented with a report that is on file in the Lynchburg Police Department's Records Section (Incident # 2002071459). Liberty University fully cooperated with the Lynchburg Police investigation and was fully supportive of it.

The matter was later turned over to the local Commonwealth Attorney's Office. In August of 2015, Liberty University made a search of its records from 2002 and was unable to find any evidence of a LUPD Incident Report for the October 17, 2002 rape reported in the crime log. No such report has emerged since.

- **ROYS:** Why was no one charged with [REDACTED] assault and/or rape, given that she identified one of her attackers and had previously alleged an attack by him? What was the extent of Liberty's investigation?

LIBERTY UNIVERSITY RESPONSE: While Liberty University received a FERPA waiver to disclose certain student records and while you have apparently been in discussions with those students, FERPA does not permit unlimited disclosures beyond the documents you have in your possession.

Liberty University is not now in a position to undertake a full evaluation of actions of numerous individuals from over 16 years ago—most of whom are no longer employees—in order to completely answer a question on the extent of its investigation of a particular case beyond what it has stated in documents you have been provided and in other answers here.

Nor is it in a position to answer why the Commonwealth Attorney never charged anyone in a given incident. While we cannot speak to this case in particular, generally, such decisions are influenced by the amount or lack of physical evidence, consistency of statements, the desire of the victim for prosecution, and the level of cooperation or non-cooperation of the victim and other witnesses.

- **ROYS:** Who on staff was responsible for reporting crime statistics in 2005?

LIBERTY UNIVERSITY RESPONSE: LUPD compiled the Campus Crime Report in 2005. Randall Smith was the Chief of Police. Current Police Chief Richard Hinkley was a LUPD First Sergeant in 2005 and was responsible for collection of statistics and compiling the initial draft of the Campus Security Report, which was then reviewed by colleagues, including Randall Smith, before being published.

- **ROYS:** Can you confirm the following people's employment (or trustee service) at LU with dates employed and titles?

- **ROYS:** Ron Godwin

LIBERTY UNIVERSITY RESPONSE: Former employee and former Trustee.

- **ROYS:** Carol Godwin (Was she ever on staff? What is relation of LU to Liberty Godparent Foundation?)

LIBERTY UNIVERSITY RESPONSE: Never an employee of Liberty University. Liberty University has no relationship with the Liberty Godparent Foundation, other than both are ministries birthed from the same church. The Godparent home and its adoption agency are ministries of Thomas Road Baptist Church.

- **ROYS:** David Young
LIBERTY UNIVERSITY RESPONSE: Former employee.
- **ROYS:** Mark Hine
LIBERTY UNIVERSITY RESPONSE: Current employee.
- **ROYS:** Kathy Rusk
LIBERTY UNIVERSITY RESPONSE: Former employee.
- **ROYS:** Sharon Har[t]less
LIBERTY UNIVERSITY RESPONSE: Former employee.
- **ROYS:** Jennifer Jones
LIBERTY UNIVERSITY RESPONSE: Former employee.
- **ROYS:** LUPD Chief Randy Smith
LIBERTY UNIVERSITY RESPONSE: Former employee.
- **ROYS:** Hope Mink
LIBERTY UNIVERSITY RESPONSE: Former employee (deceased).
- **ROYS:** Tim Mink
LIBERTY UNIVERSITY RESPONSE: Former employee.
- **ROYS:** Jonathan Falwell
LIBERTY UNIVERSITY RESPONSE: 2005 non-employee; current employee and Trustee.

ROYS: Who is Ron Brown at the N&A, who's referenced in in Mark Hine's Dec. 14, 2005, email to Jerry Falwell, Jr?

LIBERTY UNIVERSITY RESPONSE: In 2005, Ron Brown was a reporter for the Lynchburg News and Advance, the local daily paper. He sometimes reported on Liberty University matters.

For Laura Wallace:

- **ROYS:** According to Mark Tinsley, a former LU dean, Laura Wallace called him sometime between 2000—2003, when he was a LUPD officer, and urged him to drop charges against a minor and an adult whom Tinsley arrested for being “drunk in public.” (Tinsley said LUPD Chief Randy Smith told him that the two people charged were friends of an influential pastor.) Tinsley says he told Wallace that he would not drop the charges and that her request was illegal. Tinsley says Wallace then got angry and hung up. Tinsley adds that Randy Smith

took control of the matter and dropped the charges against the two alleged offenders. I would like to hear Wallace's side of the story.

LIBERTY UNIVERSITY RESPONSE: Laura Wallace completely denies this account and denies that she ever asked LUPD officers to drop charges.

- **ROYS:** During what years was Wallace the person to whom the LUPD police chief reported?

LIBERTY UNIVERSITY RESPONSE: From 2008 through January of 2016, the LUPD Police Chief reported directly to Laura Wallace.

From January 2016 through November 2020, the LUPD Police Chief reported to Ron Sloan as the Associate Vice President of Security and Public Safety, who in turn reported to Laura Wallace.

Since November 2020, the LUPD Police Chief reports to Vice President of Security and Public Safety Ron Sloan who in turn reports directly to Acting President Jerry Prevo.

For Jonathan Falwell:

- **ROYS:** You were copied on the same emails Mark Hine & Dave Young received in 2005. Yet, when you met with [REDACTED], Karen Swallow Prior, and [REDACTED] in September, you reportedly said you had never heard about [REDACTED] 2005 gang rape. Can you explain?

LIBERTY UNIVERSITY RESPONSE: Jonathan Falwell reports no recollection of a 2005 email that was not addressed to him but on which he was copied regarding something at Liberty University.

ROYS: Also, you reportedly promised [REDACTED] that LU's current investigation would include her case—that she'd "have a seat at the table." Yet that hasn't happened. Would you explain why this happened?

LIBERTY UNIVERSITY RESPONSE: Jonathan Falwell has no understanding as to whether [REDACTED] took advantage of the opportunity that she expressed interest in (to contact the investigators with her story) by reporting it through the web portal that was later set up for parties who wished to participate by the independent forensic investigators. There was a 45-day time period where this was available. Jonathan Falwell did not and does not control the investigation so if she did participate and was never followed up with, he does not know why. He simply shared the information he understood at that time that there would be an opportunity for people with concerns to reach out to the investigators.

For Dave Young/Mark Hine:

- **ROYS:** It's my understanding that [REDACTED] requested professional counseling with someone outside Liberty University. Why, then, did Liberty send [REDACTED] to Carol Godwin for counseling? Also, [REDACTED] maintains that Liberty deceived her about Carol, maintaining that Carol was a professional, outside counselor. Do you have a response to that?

LIBERTY UNIVERSITY RESPONSE: While Liberty University received a FERPA waiver to disclose certain student records and while you have apparently been in discussions with those students, FERPA does not permit unlimited disclosures beyond the documents you have in your possession.

That said, according to LinkedIn, Carol Godwin had a master's degree in Religion, Pastoral Counseling and Specialized Ministries earned in 1988 from Liberty University.

Liberty University has been unable to confirm any referral by Liberty University to Carol Godwin for any student post-assault counseling.

In 2005 a student victim of sexual assault, whether occurring on or off-campus:

- Was given information about SARP, the Sexual Assault Recovery Program, which is a free community program that provided aftercare to victims of sexual assault and would meet the victim where they live or in the hospital, but SARP's involvement is up to the victim.
 - Was given information about LU's counseling lab, which provided licensed clinical counseling services at no charge to students.
 - Was given a list of counselors in the surrounding community they could contact for assistance.
 - Was directed to contact the campus pastors for pastoral counseling if they desire, also at no charge.
- **ROYS:** [REDACTED] and her roommate repeatedly requested cameras, better lighting, etc... to be installed in the tunnel that leads to and from East Campus, where the rape occurred. Why was this not done immediately? What steps were taken to make the campus more safe?

LIBERTY UNIVERSITY RESPONSE: In the judgment of the security officials and leadership at Liberty University at the time, the campus was very safe and well-lit in 2005 and recommendations for lighting installation by security experts was always acted on by the University.

Specifically, the area at the east end of the tunnel was well lit but was slated for extensive lighting when a new street would be paved, parking lots would be added, and other development would be created to expand the campus to the south of the tunnel. Even so, some additional temporary lighting was added fairly quickly in response to the request of students and the Planning and Construction department was diligently working through a prioritization plans to add more lighting in darker places on campus. The lighting in the East Campus Apartments was not under the control of Liberty University until it purchased the apartments several years later from the private developer that built and owned them, having leased them prior to the sale. Nor was the right of way adjacent to the East Campus

Apartment complex, which was controlled by the Virginia Department of Transportation.

As for “blue light call boxes,” there is general agreement that they have been ineffective both as deterrents and as reporting conduits for assaults. So, none were installed.

Regarding the use of cameras, there is still not a consensus from security experts on cameras effectively promoting safety as they tend to be primarily after-the-fact tools to attempt to solve any crimes that were never deterred by their presence. Even so, within a few years, six cameras were installed in the east campus tunnel and at either end and cameras were similarly installed in and around another pedestrian tunnel on the west side of campus when it was constructed.

Law enforcement does not recall these tunnel cameras (east or west) as being helpful for solving any crimes, however. The cameras that have been deployed to gather evidence after-the-fact to identify perpetrators in high-risk areas and/or areas with repeated patterns of wrongdoing (e.g., opportunistic theft) have proven much more useful. Early in his tenure, Acting President Jerry Prevo approved and funded a plan for upgrading and adding still more cameras to the campus with a phased in approach.

A myriad of other safety approaches has also been developed, updated, and refined in terms of education and awareness at the student and staff level; establishment of a Title IX Office and full-time, dedicated Title IX coordinator; revised policies and procedures regarding sexual harassment and assault reporting, support, investigation, and discipline; expansion of mandatory reporters; and more.

- **ROYS:** In an email on June 19, 2005, [Executive Vice President Dave Young wrote] ~~you write~~ to [REDACTED] that [he had] ~~you have~~ been “unable to corroborate” her story that her roommate, [REDACTED] was assaulted ~~by 3 males at the tunnel~~ [“cornered by 3 males at the tunnel. They were able to take her from the tunnel entrance on east campus side and up to

the access road above it, where she was assaulted and left. This incident was reported to LUPD, along with Lynchburg police.”] You also state that LUPD has no record of what [REDACTED] describes. Given that an assault was documented **[in a statement provided]** by **[a female reporter to]** police at that time, can you explain your response?

LIBERTY UNIVERSITY RESPONSE: While Liberty University received a FERPA waiver to disclose certain student records and while you have apparently been in discussions with those students, FERPA does not permit unlimited disclosures beyond the documents you have in your possession. Beyond that, we are unwilling to speculate as to why an email from 2005 was phrased in some way though it seems clear from subsequent emails in the string that what was and was not reported to LUPD was cleared up shortly thereafter.

For Professor Jean Tweedy:

- **ROYS:** How does Dr. Tweedy respond to the allegations about her in Jennifer (McCafferty) Jones’ email to Boyd Rist on May 8, 2005?

LIBERTY UNIVERSITY RESPONSE: Liberty University will not ask an adjunct professor to respond to you about something that was written about her encounter with a student 16 years ago.

From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Friday, March 26, 2021 8:16 PM
To: Julie Roys <julie@julieroys.com>
Subject: Re: [External] Questions concerning 2005 gang rape

We are working on this. -Scott

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From: Julie Roys <julie@julieroys.com>
Sent: Tuesday, March 23, 2021 5:13:39 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: [External] Questions concerning 2005 gang rape

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Thanks for taking my call the other day. Attached are detailed questions for LU, several employees, and Jonathan Falwell concerning the 2005 alleged gang rape of [REDACTED]

[REDACTED] case resulted in the 2013 settlement between Liberty and the U.S. Dept of Education for Liberty's failure to comply with federal campus crime and security reporting requirements. However, it appears that because of a technicality, Liberty was able to avoid reporting that [REDACTED] was gang raped in 2005. Instead, the school was fined for not classifying the incident as an "Aggravated Assault, at a minimum."

[REDACTED] story raises many issues about Liberty's reporting of crimes and care for victims. The victim also is upset that Jonathan Falwell allegedly promised that her case would be part of the third-party investigation Liberty is conducting, but it's not.

I would prefer to have actual conversations with sources concerning these issues. If that is possible, please let me know.

Thank you,
Julie Roys

--
THE
ROYS 
REPORT
[Website/Facebook/Twitter](#)

From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Tuesday, April 6, 2021 10:46 AM
To: Julie Roys <julie@julieroys.com>
Subject: Re: [External] Questions concerning 2005 gang rape

Folks have been out (Easter and Spring Break).

Let me see what they're prepared to do this week.

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 6, 2021, at 10:26 AM, Julie Roys <julie@julieroys.com> wrote:

Hi Scott,

Reaching out one last time. Are you planning on responding to my detailed questions? If so, would you please let me know when I should expect them?

Thank you,
Julie

On Thu, Apr 1, 2021 at 12:11 PM Julie Roys <julie@julieroys.com> wrote:

Scott,
Can you have these answers to me by end of the day Monday?

Thanks,
Julie

On Fri, Mar 26, 2021 at 7:15 PM Lamb, Scott <scottlamb@liberty.edu> wrote:

We are working on this. -Scott

Get [Outlook for iOS](#)

From: Julie Roys <julie@julieroys.com>
Sent: Tuesday, March 23, 2021 5:13:39 PM
To: Lamb, Scott <scottlamb@liberty.edu>
Subject: [External] Questions concerning 2005 gang rape

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Thanks for taking my call the other day. Attached are detailed questions for LU, several employees, and Jonathan Falwell concerning the 2005 alleged gang rape of [REDACTED]

[REDACTED] case resulted in the 2013 settlement between Liberty and the U.S. Dept of Education for Liberty's failure to comply with federal campus crime and security reporting requirements. However, it appears that because of a technicality, Liberty was able to avoid reporting that [REDACTED] was gang raped in 2005. Instead, the school was fined for not classifying the incident as an "Aggravated Assault, at a minimum."

[REDACTED] story raises many issues about Liberty's reporting of crimes and care for victims. The victim also is upset that Jonathan Falwell allegedly promised that her case would be part of the third-party investigation Liberty is conducting, but it's not.

I would prefer to have actual conversations with sources concerning these issues. If that is possible, please let me know.

Thank you,
Julie Roys

—

Lamb Rule 41
Exhibit 10(a)

LU004684

THE
ROYS REPORT
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ROYS REPORT
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THE
ROYS REPORT
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From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Friday, April 9, 2021 10:39 AM
To: Sloan, Ronald Thomas <rtsloan@liberty.edu>; Hicks, Scott <smhicks@liberty.edu>; Hinkley, Richard Dale (Police Department (LUPD)) <rdhinkle@liberty.edu>; Hine, Mark <mhine@liberty.edu>; Corry, David M (Legal Affairs) <dcorry@liberty.edu>
Subject: Fwd: [External] Questions concerning 2005 gang rape
Attach: Questions for Liberty University.docx

FYI

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Mar 23, 2021, at 5:13 PM, Julie Roys <julie@julieroys.com> wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Thanks for taking my call the other day. Attached are detailed questions for LU, several employees, and Jonathan Falwell concerning the 2005 alleged gang rape of [REDACTED]

[REDACTED] case resulted in the 2013 settlement between Liberty and the U.S. Dept of Education for Liberty's failure to comply with federal campus crime and security reporting requirements. However, it appears that because of a technicality, Liberty was able to avoid reporting that [REDACTED] was gang raped in 2005. Instead, the school was fined for not classifying the incident as an "Aggravated Assault, at a minimum."

[REDACTED] story raises many issues about Liberty's reporting of crimes and care for victims. The victim also is upset that Jonathan Falwell allegedly promised that her case would be part of the third-party investigation Liberty is conducting, but it's not.

I would prefer to have actual conversations with sources concerning these issues. If that is possible, please let me know.

Thank you,
Julie Roys

THE
ROYS  
REPORT
[Website/Facebook/Twitter](#)

Lamb Rule 41
Exhibit 10(am)

From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Tuesday, April 20, 2021 7:23 PM
To: Julie Roys <julie@julieroys.com>
Subject: 3 documents
Attach: Settlement agreement. LU and DOE. Executed December 2013 - Copy.pdf; LU Statement on settlement of fine for isolated errors in 2005 - Copy.pdf; Clery Position Statement. Sent to DOE 6-28-13 - Copy.pdf

Julie:

Attached are the three documents I referred to in the phone call to you this evening.

All the best,
-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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SETTLEMENT AGREEMENT

This Agreement is made between Liberty University of Lynchburg, Virginia (OPE ID #02053000) (Liberty) and the United States Department of Education (Department), Federal Student Aid (FSA), acting through its Director, Administrative Actions and Appeals Service Group, and is effective when the last party executes this Agreement.

A. On April 3, 2013, the Department sent Liberty a letter stating that the Department intended to fine Liberty \$165,000 (hereafter “the proposed fine action”) based on FSA’s findings that Liberty had failed to comply with the requirements of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the Clery Act) included in § 485(f) of the Higher Education Act of 1965, as amended.

B. The proposed fine action was based on a Final Program Review Determination (FPRD) issued by FSA on March 23, 2010. In the FPRD, FSA concluded that Liberty failed to: properly classify and disclose crime statistics; issue timely warnings to its campus community; properly maintain the daily crime log; include required policy statements in the Annual Security Report (ASR) and distribute the ASR in accordance with the Department’s regulations. Liberty contests the findings of the FPRD.

C. The Department has determined that the records and evidence in this case do not indicate that Liberty received a report of a sexual assault in May 2005. Therefore, the Department acknowledges that the statements in the intent to fine letter and the FPRD referring to the report of an incident in May 2005, and references to Liberty’s reporting obligations, were incorrect.

D. The parties acknowledge that they disagree on whether Liberty correctly characterized and reported, for Clery Act purposes, a report of a crime that the Liberty Police Department received in April 2005 as discussed in the FPRD. In the FPRD, FSA concluded that Liberty had violated the Clery Act by failing to include this reported crime in its crime statistics and crime log and by not issuing a timely warning. Liberty contends that it did not receive a report of a crime that required an addition to the crime statistics, a timely warning, or a listing in the crime log. Liberty also contends that it did not receive proper notice of an alleged violation for which a fine was assessed, and therefore was not afforded an adequate opportunity to respond. FSA does not agree with Liberty’s contentions.

E. FSA acknowledges that the record indicates that Liberty appropriately responded to the student who provided the April 2005 complaint referenced in paragraph D., actively investigated the incident and acted diligently to assist the student following the incident, including offering appropriate support services. FSA further acknowledges that nothing in the record indicates that Liberty sought to cover-up the alleged incident or intentionally withhold information pertaining to it from students, faculty, staff, or the public.

F. As part of the proposed fine action, FSA included a proposed fine for Liberty’s failure to include in its ASR a statement about the institution’s procedures for voluntary confidential reporting of crimes by professional and pastoral counselors. This statement is required if the institution has such procedures. Liberty affirms to FSA that it does not have procedures for

voluntary confidential reporting of crimes by professional and pastoral counselors. FSA acknowledges that, under these circumstances, Liberty was not required to include a statement about these procedures in the ASR.

G. On April 22, 2013, Liberty appealed the proposed fine action and requested a hearing. The appeal was assigned to the Department's Office of Hearings and Appeals and docketed as In the Matter of Liberty University, Docket No. 13-07-SF.

H. By entering into this Agreement, Liberty and the Department agree to resolve the proposed fine action without any further administrative procedures.

I. Nothing in this Agreement constitutes an admission of liability or wrongdoing by Liberty.

In consideration of the mutual covenants and conditions contained in this Agreement, and intending to be legally bound, the parties agree as follows:


1. Liberty agrees to pay a total of \$120,000 to the Department to resolve the proposed fine action. Liberty will make the payment of \$120,000 at the time it provides the Department with a signed copy of this Agreement in accordance with payment instructions provided by the Department.
2. Liberty withdraws its appeal of the proposed fine action. The Department and Liberty agree that the administration fine action is fully resolved. Upon full execution of this Agreement and FSA's receipt of Liberty's payment of the fine amount, FSA will file a motion to dismiss the pending action.
3. The Department agrees not to initiate further administrative action against Liberty based on the FPRD dated April 3, 2012.
4. Liberty acknowledges that it will continue to take steps to comply with the Clery Act and ensure that all future Clery Act reports are accurate and complete.
5. This Agreement does not waive, compromise, restrict, or settle:
 - a. Any past, present, or future violation of the criminal or civil fraud laws of the United States.
 - b. Any presently pending or future action taken by the United States under the criminal laws or civil fraud laws of the United States.

The Department is not aware of any such actions pending against Liberty based on the Clery Act issues addressed in this Agreement.

6. This Agreement does not address or resolve any complaints filed with or any investigations undertaken by the Department's Office of Civil Rights under any applicable law or regulation.

Liberty and the Department each warrant that the undersigned representative is authorized to sign this Agreement on its behalf.


FOR LIBERTY UNIVERSITY



Jerry L. Falwell, Jr.
President
Liberty University

Dated: 12/17/2013

FOR THE UNITED STATES DEPARTMENT OF EDUCATION



Mary E. Gust
Director
Administrative Actions and Appeals Service Group
Federal Student Aid
U.S. Department of Education

Dated: 12/18/2013

**LIBERTY UNIVERSITY STATEMENT ON SETTLEMENT
OF FINE FOR ISOLATED ERRORS IN 2005**

On December 23, 2003, the US Department of Education's case against Liberty University was dismissed following a successful settlement by Liberty University of its appeal. The Department admitted that several statements in its Final Determination document and subsequent fine letter were erroneous and that its attempt to impose a fine of \$165,000 was improper under the circumstances.

The Department confirmed that its previous statements concerning Liberty's failures following a report of sexual assault in May of 2005 were in error because the University never received such a report. The Department also acknowledged in the settlement that Liberty appropriately responded to the student who complained of improper actions in April of 2005, that it acted diligently in assisting the student and that it offered appropriate support services. The Department further acknowledged that its attempt to fine Liberty for failure to include certain statements in its notice of procedures was erroneous because the law did not require it. Without admitting liability, Liberty chose to settle the remaining issues for substantially reduced fine.

On April 4, 2013, Liberty University received a notice from the Department regarding a 2005 violation of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, commonly known as the Clery Act. The Clery Act requires all colleges and universities that participate in the federal financial aid programs to keep and disclose information about crime on and near their campuses. The Department of Education monitors Clery Act compliance and can impose a fine of up to \$27,500 for each violation.

The violations originally determined by the Department involved Liberty's reporting in 2005 of separate alleged sexual assaults involving a single victim as a single incident, rather than as separately reportable incidents, and in issuing a single campus warning instead of three. In that same year, the Department said Liberty made clerical errors by posting its 2005 Campus Security Report on its website after the regulatory deadline and omitting certain language required by the Department of Education rules. The Department of Education proposed the maximum possible fine of \$27,500 for what it considered six separate violations.

Liberty University's General Counsel, David Corry, issued the following statement:

There is no suggestion that these reporting errors caused actual harm nor was the safety of any students or staff jeopardized. Additionally, since 2005, Liberty has significantly improved its data collection processes, Clery Act reporting procedures and campus warning systems, using state-of-the-art technology not only to ensure compliance with the federal regulations but, more importantly, to achieve a high level of campus safety for its students and employees. The safety of our students and faculty is paramount, and we take very seriously our obligation to report crimes committed on campus. Any reporting errors that occurred nine years ago certainly should not have happened, and aggressive measures were taken to ensure that they would not be repeated. While the University understands the importance of enforcing compliance with the Clery Act, it was unfortunate that it took an appeal for the Department of Education to recognize the evidence Liberty had presented all along and the significant steps Liberty has taken to increase campus safety. Instead, the Department called for the maximum fines, based on one reporting failure and technical errors on our forms. A fine of \$165,000 in this case was excessive, and the University was

pleased to successfully resolve the appeal last year with admissions of the Department's errors and a greatly reduced fine."

Further information on Liberty's compliance with the requirements of the Clery Act and the campus security programs in place to protect the University community may be found at <http://www.liberty.edu/index.cfm?PID=18240>.

Liberty University Position Summary

Liberty University is dedicated to the safety and security of its students, staff and community, and it is fully supportive of the principles behind the Clery Act. The University has filed this appeal in support of those principles by ensuring that the FPRD and FSA fine letter are accurate, fairly reflect the University's conduct and assess penalties consistent with the manner in which other institutions have been fined for similar errors. Fairness and proportionality are entirely consistent with the goals of the statute, and Liberty University is fully prepared to take responsibility for its errors based on an accurate record.

But one thing is clear: While the Liberty University Police Department ("LUPD") made inadvertent errors in reporting, the LUPD and the University went to great lengths to attempt to ascertain the facts and report them to the student body. The University respects the law and accepts responsibility for its errors. But fining the University based on an inaccurate record that exaggerates the circumstances and ignores the good conduct of the LUPD officers would undermine the process and represent an unjust result.

The FPRD and FSA fine letter contain several material mischaracterizations of both the reporting of the underlying incident and the University's response. The initial and follow-up reports of the underlying incident were inconsistent and confusing, with the victim alternating between a refusal to cooperate and her subsequent filing of supplemental information that on the one hand expanded the alleged scope and details of the incident but on the other was unsupported in either fact or detail.

With hindsight, the facts appear simple. A student reported that she was sexually assaulted on February 12 and 13, 2005. The FPRD concluded, and the Department acknowledges, that the University properly recorded and reported those incidents. The LUPD filed subsequent incident reports involving the same victim as a *continuation* of the February incident, including an alleged April 13, 2005 assault. This was a good faith error committed by a dedicated LUPD officer who the victim herself said should be commended for "going above and beyond the calling of her job." An extensive investigation by LUPD of all the incident reports it received from 2004 through 2006 demonstrates conclusively that this was an inadvertent, isolated error, not characteristic of LUPD practice. As such, it should not be treated in the same manner as intentional, repeated or egregious conduct.

In the service of accuracy and proportionality, the FPRD, and the resulting FSA fine letter contain certain errors and mischaracterizations that should be corrected to reflect the following:

- This is not a case of intentional underreporting of any alleged crimes; it is an inadvertent failure to reclassify an isolated incident based on conflicting and unsupported after-reported information.
- Most of the alleged violations resulted from one inadvertent underlying error, namely, the filing of two subsequent incident reports as *supplemental* to the February incident rather than as reports of new incidents.

- The LUPD officer assigned to the case made immediate and extensive efforts to ascertain the true facts, even though the student victim repeatedly refused to provide details about the April 13, 2005 incident, and the LUPD officer made an accurate report based on her knowledge at the time.
- Importantly, the record is simply incorrect in stating that the victim reported a “gang-rape” to LUPD in May 2005 (as alleged on p.8 of the FPRD and pp.4 and 8 of the FSA fine letter); no such report was ever made. While all aggravated crimes are serious and must be reported, the FPRD’s imprecise and mistaken discussion of the incident as a “gang-rape” raises the stakes considerably. To Liberty University’s knowledge a “gang-rape” did not occur and Liberty University did not fail to report such an incident.
- The FSA fine letter erroneously imposed fines for failure to issue timely warnings for *three separate incidents*. The only incident as to which Liberty University failed to issue a timely warning was the report of an alleged April 13 assault, made on April 18, 2005. The FSA fine letter makes reference to (1) the two February 2005 sexual assaults, even though it does not appear the Department investigated whether LU issued a timely warning, and (2) what the FSA refers to as “the alleged gang-rape” reported by the victim in May 2005, even though the victim never made any such allegation or report.

Liberty University is prepared to pay an appropriate, proportionate fine for compliance deficiencies identified during ED’s program review. However, as the record stands, the Department’s findings and fines are based on a demonstrably inaccurate record that embellishes and, inevitably, sensationalizes, the incident reports. It also treats Liberty University unfairly by assessing fines well out of proportion to fines on other institutions facing similar circumstances. Accordingly, the University respectfully requests that the ED correct the record and reduce the fines in accordance with the schedule proposed below.

Finding 1

The Department of Education assessed the maximum fine of \$27,500 for Liberty University’s alleged failure properly to compile and disclose crime statistics for calendar year 2005. Specifically, Liberty was fined for allegedly neglecting properly to record an incident reported by the student on April 13 as an *aggravated* assault.

Liberty objects to the findings and this fine on the following grounds:

- The assumption throughout the FPRD is that the student’s report on the incident was clear and consistent and required one outcome. That is not the case. In fact, the student’s written report of April 18, 2005 does not provide facts sufficient to conclude that she was the victim of an *aggravated* assault.
 - Under the standards outlined in the Uniform Crime Reporting Handbook, aggravated assault is defined as, “An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.”
 - The victim’s April 18, 2005 report mentions a man holding a “wooden type stick” but does not include any description of how it was used. The report does not state that assailants attacked her or threatened to attack her with the stick, and there is

no indication that the attack was conducted with the purpose of inflicting severe bodily harm.

- Despite repeated attempts by the institution, the student refused to provide any additional details about the April 13, 2005 incident.
- Regardless of whether LU should have reported the April 13 incident, the University did not intentionally exclude the incident from its Campus Security Report. Any alleged violation related to this instance was the result of two factors: (1) the inadvertent inclusion of subsequent reports as a continuation of the initial February incident, and (2) the student's repeated refusal to provide more details about the incident.

Consequently, Liberty University requests that the proposed fine be adjusted to reflect the mitigating factors discussed above and the factual errors in the findings be corrected. Liberty proposes that a fine of \$20,000 is adequate to reflect the seriousness of the failure to report the incident properly but still reflective of the conduct of the LUPD under ambiguous and changing circumstances.

Finding 2

ED assessed a maximum fine of \$27,500 for Liberty's asserted failure to issue a timely warning in response to three incidents:

- The two alleged sexual assaults reported by the victim on February 20, 2005.
- The alleged aggravated assault on April 13, 2005 and reported by the victim on April 18, 2005.
- The alleged gang-rape reported by the same victim on May 20, 2005.

Liberty objects to this fine on the following grounds:

The amount of the fine is excessive, because it is based on an alleged failure to issue a timely warning as to three incidents, whereas the fine should be based only on one incident. The FPRD found that LU failed to issue a timely warning in response to the alleged April 13 assault. However, there is no indication in the FPRD that the Department investigated whether LU issued a timely warning in response to the February 2005 incidents or the additional information provided by the victim on May 20, 2005, and, as noted above, the supplemental information *did not* allege that any gang-rape occurred.

In response to the April 18, 2005 assault report, Liberty again notes that, despite repeated attempts to ascertain what transpired on April 13, the victim never provided sufficient information to conclude that an aggravated assault had taken place. In addition, the student's statements repeatedly emphasize that she was being targeted in connection with her relationship with Raphael Garcia. As a result, the institution concluded that the alleged assailants did not pose a serious or continuing threat to other students or the employees of the University.

Liberty University requests that the findings and proposed fine be adjusted to reflect that there is only one incident as to which the University failed to issue a timely warning. Liberty proposes a fine of \$10,000 to address this issue.

Finding 3

ED assessed a fine of \$27,500 for Liberty's alleged failure to maintain an accurate crime log.

Liberty objects to the size of the fine for this alleged violation. Under 34 C.F.R. 668.92, the gravity of the violation must be considered when the FSA determines its fine. The FSA provided no analysis of the gravity of Liberty's violation. As shown above, this violation was the result of an unintentional and isolated error and should not be subject to the maximum fine. There are several mitigating factors here, including the fact that this was an error by a dedicated police officer attempting to aggregate facts she believed stemmed from a single underlying relationship to create a record against the perpetrator. It would be consistent with the goals of the Clery Act to recognize this mitigating factor.

As a result, Liberty proposes a fine in the amount of \$20,000 to resolve this finding.

Finding 4

ED assessed two maximum fines of \$27,500 on the grounds that Liberty's annual security report allegedly did not include the institution's policies regarding:

- the preparation of the annual disclosure of crime statistics; and
- the voluntary confidential reporting of crimes by professional and pastoral counselors.

Liberty objects to both fines. Under 34 C.F.R. 668.92, the gravity of the violation must be considered when the FSA determines its fine. The FSA provided no analysis of the gravity of Liberty's alleged violations. Furthermore, fines for similar violations by other schools, notably Yale University and the University of Vermont, have not incurred the maximum fine. (*See* Letter from Mary E. Gust, Director, Federal Student Aid/Program Compliance, U.S. Department of Education, to Dr. Richard Levine, President Yale University (April 19, 2013); Letter from Mary E. Gust, Director, Federal Student Aid/Program Compliance, U.S. Department of Education, to Dr. Andrew J. Bramley, Ph.D., President, University of Vermont (March 9, 2012)).

Further, Liberty does not believe that the absence of a policy regarding the voluntary confidential reporting of crimes by professional and pastoral counselors was a violation of the regulations. Under 34 C.F.R. 668.46(b)(4)(iii), institutions must include a statement of current policies that, "[d]escribes procedures, *if any*, that encourage pastoral counselors and professional counselors ... to inform the persons they are counseling of any procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics." (Emphasis added). Based on the plain meaning of the regulation, Liberty is only required to include a statement in the ASR regarding reporting of crimes by professional and pastoral counselors *if* such a policy was in place. Liberty provided ED with copies of its policies. The FPRD did not establish that Liberty had a policy regarding reporting of crimes by professional and pastoral counselors and to the university's knowledge, it did not have such a policy at the time.

Based on the above considerations, Liberty proposes a fine in the total amount of \$5,000 to resolve finding 4.

Finding 5

ED assessed a fine of \$27,500 for Liberty's failure to timely distribute its ASR for calendar year 2005. Liberty agrees to pay the full amount of this fine.

From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Wednesday, April 21, 2021 5:17 PM
To: [REDACTED]
Subject: RE: Full Reporting Request [REDACTED]
Attach: Clery Position Statement. Sent to DOE 6-28-13 - Copy.pdf; LU Statement on settlement of fine for isolated errors in 2005 - Copy.pdf; Settlement agreement. LU and DOE. Executed December 2013 - Copy.pdf

[REDACTED]
I want to confirm that I've received your email and your request.

I need to clarify that we've not collected or sent anything to Julie Roys that is your confidential information.

I sent Ms. Roys three documents last night – documents that do not require FERPA permission. I have attached here those documents that I sent to Julie.

Our team will be meeting soon regarding your request. The authority to release documents does not fall under my authority, but I am taking point on bringing your request to those who can help complete the request.

I will return tomorrow with the FERPA information. I want this process to be as easy for you to navigate as possible.

My word is my bond.

All the best,
-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

LIBERTY
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Liberty University | Training Champions for Christ since 1971

On Apr 21, 2021, at 11:51 AM, [REDACTED] wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

In addition, I am requesting a FERPA form to allow Julie Roys to discuss the case. Please send that over as soon as possible.

On Wed, Apr 21, 2021 at 8:04 AM [REDACTED] wrote:
Good Morning Scott,

I would like to request any and all documentation - police reports (#050465 et al), statements, investigation findings, and settlements - regarding my case. It is my understanding that there is more documentation but there would be high redaction if requested by a third party. As the victim, I am requesting full access to my reporting. I am hopeful that I can receive these in a timely manner as they were recently collected for Julie Roys.

Thank you
[REDACTED]

Lamb Rule 41
Exhibit 10(ao)

LU004703

Liberty University Position Summary

Liberty University is dedicated to the safety and security of its students, staff and community, and it is fully supportive of the principles behind the Clery Act. The University has filed this appeal in support of those principles by ensuring that the FPRD and FSA fine letter are accurate, fairly reflect the University's conduct and assess penalties consistent with the manner in which other institutions have been fined for similar errors. Fairness and proportionality are entirely consistent with the goals of the statute, and Liberty University is fully prepared to take responsibility for its errors based on an accurate record.

But one thing is clear: While the Liberty University Police Department ("LUPD") made inadvertent errors in reporting, the LUPD and the University went to great lengths to attempt to ascertain the facts and report them to the student body. The University respects the law and accepts responsibility for its errors. But fining the University based on an inaccurate record that exaggerates the circumstances and ignores the good conduct of the LUPD officers would undermine the process and represent an unjust result.

The FPRD and FSA fine letter contain several material mischaracterizations of both the reporting of the underlying incident and the University's response. The initial and follow-up reports of the underlying incident were inconsistent and confusing, with the victim alternating between a refusal to cooperate and her subsequent filing of supplemental information that on the one hand expanded the alleged scope and details of the incident but on the other was unsupported in either fact or detail.

With hindsight, the facts appear simple. A student reported that she was sexually assaulted on February 12 and 13, 2005. The FPRD concluded, and the Department acknowledges, that the University properly recorded and reported those incidents. The LUPD filed subsequent incident reports involving the same victim as a *continuation* of the February incident, including an alleged April 13, 2005 assault. This was a good faith error committed by a dedicated LUPD officer who the victim herself said should be commended for "going above and beyond the calling of her job." An extensive investigation by LUPD of all the incident reports it received from 2004 through 2006 demonstrates conclusively that this was an inadvertent, isolated error, not characteristic of LUPD practice. As such, it should not be treated in the same manner as intentional, repeated or egregious conduct.

In the service of accuracy and proportionality, the FPRD, and the resulting FSA fine letter contain certain errors and mischaracterizations that should be corrected to reflect the following:

- This is not a case of intentional underreporting of any alleged crimes; it is an inadvertent failure to reclassify an isolated incident based on conflicting and unsupported after-reported information.
- Most of the alleged violations resulted from one inadvertent underlying error, namely, the filing of two subsequent incident reports as *supplemental* to the February incident rather than as reports of new incidents.

- The LUPD officer assigned to the case made immediate and extensive efforts to ascertain the true facts, even though the student victim repeatedly refused to provide details about the April 13, 2005 incident, and the LUPD officer made an accurate report based on her knowledge at the time.
- Importantly, the record is simply incorrect in stating that the victim reported a “gang-rape” to LUPD in May 2005 (as alleged on p.8 of the FPRD and pp.4 and 8 of the FSA fine letter); no such report was ever made. While all aggravated crimes are serious and must be reported, the FPRD’s imprecise and mistaken discussion of the incident as a “gang-rape” raises the stakes considerably. To Liberty University’s knowledge a “gang-rape” did not occur and Liberty University did not fail to report such an incident.
- The FSA fine letter erroneously imposed fines for failure to issue timely warnings for *three separate incidents*. The only incident as to which Liberty University failed to issue a timely warning was the report of an alleged April 13 assault, made on April 18, 2005. The FSA fine letter makes reference to (1) the two February 2005 sexual assaults, even though it does not appear the Department investigated whether LU issued a timely warning, and (2) what the FSA refers to as “the alleged gang-rape” reported by the victim in May 2005, even though the victim never made any such allegation or report.

Liberty University is prepared to pay an appropriate, proportionate fine for compliance deficiencies identified during ED’s program review. However, as the record stands, the Department’s findings and fines are based on a demonstrably inaccurate record that embellishes and, inevitably, sensationalizes, the incident reports. It also treats Liberty University unfairly by assessing fines well out of proportion to fines on other institutions facing similar circumstances. Accordingly, the University respectfully requests that the ED correct the record and reduce the fines in accordance with the schedule proposed below.

Finding 1

The Department of Education assessed the maximum fine of \$27,500 for Liberty University’s alleged failure properly to compile and disclose crime statistics for calendar year 2005. Specifically, Liberty was fined for allegedly neglecting properly to record an incident reported by the student on April 13 as an *aggravated* assault.

Liberty objects to the findings and this fine on the following grounds:

- The assumption throughout the FPRD is that the student’s report on the incident was clear and consistent and required one outcome. That is not the case. In fact, the student’s written report of April 18, 2005 does not provide facts sufficient to conclude that she was the victim of an *aggravated* assault.
 - Under the standards outlined in the Uniform Crime Reporting Handbook, aggravated assault is defined as, “An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.”
 - The victim’s April 18, 2005 report mentions a man holding a “wooden type stick” but does not include any description of how it was used. The report does not state that assailants attacked her or threatened to attack her with the stick, and there is

no indication that the attack was conducted with the purpose of inflicting severe bodily harm.

- Despite repeated attempts by the institution, the student refused to provide any additional details about the April 13, 2005 incident.
- Regardless of whether LU should have reported the April 13 incident, the University did not intentionally exclude the incident from its Campus Security Report. Any alleged violation related to this instance was the result of two factors: (1) the inadvertent inclusion of subsequent reports as a continuation of the initial February incident, and (2) the student's repeated refusal to provide more details about the incident.

Consequently, Liberty University requests that the proposed fine be adjusted to reflect the mitigating factors discussed above and the factual errors in the findings be corrected. Liberty proposes that a fine of \$20,000 is adequate to reflect the seriousness of the failure to report the incident properly but still reflective of the conduct of the LUPD under ambiguous and changing circumstances.

Finding 2

ED assessed a maximum fine of \$27,500 for Liberty's asserted failure to issue a timely warning in response to three incidents:

- The two alleged sexual assaults reported by the victim on February 20, 2005.
- The alleged aggravated assault on April 13, 2005 and reported by the victim on April 18, 2005.
- The alleged gang-rape reported by the same victim on May 20, 2005.

Liberty objects to this fine on the following grounds:

The amount of the fine is excessive, because it is based on an alleged failure to issue a timely warning as to three incidents, whereas the fine should be based only on one incident. The FPRD found that LU failed to issue a timely warning in response to the alleged April 13 assault. However, there is no indication in the FPRD that the Department investigated whether LU issued a timely warning in response to the February 2005 incidents or the additional information provided by the victim on May 20, 2005, and, as noted above, the supplemental information *did not* allege that any gang-rape occurred.

In response to the April 18, 2005 assault report, Liberty again notes that, despite repeated attempts to ascertain what transpired on April 13, the victim never provided sufficient information to conclude that an aggravated assault had taken place. In addition, the student's statements repeatedly emphasize that she was being targeted in connection with her relationship with Raphael Garcia. As a result, the institution concluded that the alleged assailants did not pose a serious or continuing threat to other students or the employees of the University.

Liberty University requests that the findings and proposed fine be adjusted to reflect that there is only one incident as to which the University failed to issue a timely warning. Liberty proposes a fine of \$10,000 to address this issue.

Finding 3

ED assessed a fine of \$27,500 for Liberty's alleged failure to maintain an accurate crime log.

Liberty objects to the size of the fine for this alleged violation. Under 34 C.F.R. 668.92, the gravity of the violation must be considered when the FSA determines its fine. The FSA provided no analysis of the gravity of Liberty's violation. As shown above, this violation was the result of an unintentional and isolated error and should not be subject to the maximum fine. There are several mitigating factors here, including the fact that this was an error by a dedicated police officer attempting to aggregate facts she believed stemmed from a single underlying relationship to create a record against the perpetrator. It would be consistent with the goals of the Clery Act to recognize this mitigating factor.

As a result, Liberty proposes a fine in the amount of \$20,000 to resolve this finding.

Finding 4

ED assessed two maximum fines of \$27,500 on the grounds that Liberty's annual security report allegedly did not include the institution's policies regarding:

- the preparation of the annual disclosure of crime statistics; and
- the voluntary confidential reporting of crimes by professional and pastoral counselors.

Liberty objects to both fines. Under 34 C.F.R. 668.92, the gravity of the violation must be considered when the FSA determines its fine. The FSA provided no analysis of the gravity of Liberty's alleged violations. Furthermore, fines for similar violations by other schools, notably Yale University and the University of Vermont, have not incurred the maximum fine. (*See* Letter from Mary E. Gust, Director, Federal Student Aid/Program Compliance, U.S. Department of Education, to Dr. Richard Levine, President Yale University (April 19, 2013); Letter from Mary E. Gust, Director, Federal Student Aid/Program Compliance, U.S. Department of Education, to Dr. Andrew J. Bramley, Ph.D., President, University of Vermont (March 9, 2012)).

Further, Liberty does not believe that the absence of a policy regarding the voluntary confidential reporting of crimes by professional and pastoral counselors was a violation of the regulations. Under 34 C.F.R. 668.46(b)(4)(iii), institutions must include a statement of current policies that, "[d]escribes procedures, *if any*, that encourage pastoral counselors and professional counselors ... to inform the persons they are counseling of any procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics." (Emphasis added). Based on the plain meaning of the regulation, Liberty is only required to include a statement in the ASR regarding reporting of crimes by professional and pastoral counselors *if* such a policy was in place. Liberty provided ED with copies of its policies. The FPRD did not establish that Liberty had a policy regarding reporting of crimes by professional and pastoral counselors and to the university's knowledge, it did not have such a policy at the time.

Based on the above considerations, Liberty proposes a fine in the total amount of \$5,000 to resolve finding 4.

Finding 5

ED assessed a fine of \$27,500 for Liberty's failure to timely distribute its ASR for calendar year 2005. Liberty agrees to pay the full amount of this fine.

**LIBERTY UNIVERSITY STATEMENT ON SETTLEMENT
OF FINE FOR ISOLATED ERRORS IN 2005**

On December 23, 2003, the US Department of Education's case against Liberty University was dismissed following a successful settlement by Liberty University of its appeal. The Department admitted that several statements in its Final Determination document and subsequent fine letter were erroneous and that its attempt to impose a fine of \$165,000 was improper under the circumstances.

The Department confirmed that its previous statements concerning Liberty's failures following a report of sexual assault in May of 2005 were in error because the University never received such a report. The Department also acknowledged in the settlement that Liberty appropriately responded to the student who complained of improper actions in April of 2005, that it acted diligently in assisting the student and that it offered appropriate support services. The Department further acknowledged that its attempt to fine Liberty for failure to include certain statements in its notice of procedures was erroneous because the law did not require it. Without admitting liability, Liberty chose to settle the remaining issues for substantially reduced fine.

On April 4, 2013, Liberty University received a notice from the Department regarding a 2005 violation of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, commonly known as the Clery Act. The Clery Act requires all colleges and universities that participate in the federal financial aid programs to keep and disclose information about crime on and near their campuses. The Department of Education monitors Clery Act compliance and can impose a fine of up to \$27,500 for each violation.

The violations originally determined by the Department involved Liberty's reporting in 2005 of separate alleged sexual assaults involving a single victim as a single incident, rather than as separately reportable incidents, and in issuing a single campus warning instead of three. In that same year, the Department said Liberty made clerical errors by posting its 2005 Campus Security Report on its website after the regulatory deadline and omitting certain language required by the Department of Education rules. The Department of Education proposed the maximum possible fine of \$27,500 for what it considered six separate violations.

Liberty University's General Counsel, David Corry, issued the following statement:

There is no suggestion that these reporting errors caused actual harm nor was the safety of any students or staff jeopardized. Additionally, since 2005, Liberty has significantly improved its data collection processes, Clery Act reporting procedures and campus warning systems, using state-of-the-art technology not only to ensure compliance with the federal regulations but, more importantly, to achieve a high level of campus safety for its students and employees. The safety of our students and faculty is paramount, and we take very seriously our obligation to report crimes committed on campus. Any reporting errors that occurred nine years ago certainly should not have happened, and aggressive measures were taken to ensure that they would not be repeated. While the University understands the importance of enforcing compliance with the Clery Act, it was unfortunate that it took an appeal for the Department of Education to recognize the evidence Liberty had presented all along and the significant steps Liberty has taken to increase campus safety. Instead, the Department called for the maximum fines, based on one reporting failure and technical errors on our forms. A fine of \$165,000 in this case was excessive, and the University was

pleased to successfully resolve the appeal last year with admissions of the Department's errors and a greatly reduced fine."

Further information on Liberty's compliance with the requirements of the Clery Act and the campus security programs in place to protect the University community may be found at <http://www.liberty.edu/index.cfm?PID=18240>.

SETTLEMENT AGREEMENT

This Agreement is made between Liberty University of Lynchburg, Virginia (OPE ID #02053000) (Liberty) and the United States Department of Education (Department), Federal Student Aid (FSA), acting through its Director, Administrative Actions and Appeals Service Group, and is effective when the last party executes this Agreement.

A. On April 3, 2013, the Department sent Liberty a letter stating that the Department intended to fine Liberty \$165,000 (hereafter “the proposed fine action”) based on FSA’s findings that Liberty had failed to comply with the requirements of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the Clery Act) included in § 485(f) of the Higher Education Act of 1965, as amended.

B. The proposed fine action was based on a Final Program Review Determination (FPRD) issued by FSA on March 23, 2010. In the FPRD, FSA concluded that Liberty failed to: properly classify and disclose crime statistics; issue timely warnings to its campus community; properly maintain the daily crime log; include required policy statements in the Annual Security Report (ASR) and distribute the ASR in accordance with the Department’s regulations. Liberty contests the findings of the FPRD.

C. The Department has determined that the records and evidence in this case do not indicate that Liberty received a report of a sexual assault in May 2005. Therefore, the Department acknowledges that the statements in the intent to fine letter and the FPRD referring to the report of an incident in May 2005, and references to Liberty’s reporting obligations, were incorrect.

D. The parties acknowledge that they disagree on whether Liberty correctly characterized and reported, for Clery Act purposes, a report of a crime that the Liberty Police Department received in April 2005 as discussed in the FPRD. In the FPRD, FSA concluded that Liberty had violated the Clery Act by failing to include this reported crime in its crime statistics and crime log and by not issuing a timely warning. Liberty contends that it did not receive a report of a crime that required an addition to the crime statistics, a timely warning, or a listing in the crime log. Liberty also contends that it did not receive proper notice of an alleged violation for which a fine was assessed, and therefore was not afforded an adequate opportunity to respond. FSA does not agree with Liberty’s contentions.

E. FSA acknowledges that the record indicates that Liberty appropriately responded to the student who provided the April 2005 complaint referenced in paragraph D., actively investigated the incident and acted diligently to assist the student following the incident, including offering appropriate support services. FSA further acknowledges that nothing in the record indicates that Liberty sought to cover-up the alleged incident or intentionally withhold information pertaining to it from students, faculty, staff, or the public.

F. As part of the proposed fine action, FSA included a proposed fine for Liberty’s failure to include in its ASR a statement about the institution’s procedures for voluntary confidential reporting of crimes by professional and pastoral counselors. This statement is required if the institution has such procedures. Liberty affirms to FSA that it does not have procedures for

voluntary confidential reporting of crimes by professional and pastoral counselors. FSA acknowledges that, under these circumstances, Liberty was not required to include a statement about these procedures in the ASR.

G. On April 22, 2013, Liberty appealed the proposed fine action and requested a hearing. The appeal was assigned to the Department's Office of Hearings and Appeals and docketed as In the Matter of Liberty University, Docket No. 13-07-SF.

H. By entering into this Agreement, Liberty and the Department agree to resolve the proposed fine action without any further administrative procedures.

I. Nothing in this Agreement constitutes an admission of liability or wrongdoing by Liberty.

In consideration of the mutual covenants and conditions contained in this Agreement, and intending to be legally bound, the parties agree as follows:

1. Liberty agrees to pay a total of \$120,000 to the Department to resolve the proposed fine action. Liberty will make the payment of \$120,000 at the time it provides the Department with a signed copy of this Agreement in accordance with payment instructions provided by the Department.
2. Liberty withdraws its appeal of the proposed fine action. The Department and Liberty agree that the administration fine action is fully resolved. Upon full execution of this Agreement and FSA's receipt of Liberty's payment of the fine amount, FSA will file a motion to dismiss the pending action.
3. The Department agrees not to initiate further administrative action against Liberty based on the FPRD dated April 3, 2012.
4. Liberty acknowledges that it will continue to take steps to comply with the Clery Act and ensure that all future Clery Act reports are accurate and complete.
5. This Agreement does not waive, compromise, restrict, or settle:
 - a. Any past, present, or future violation of the criminal or civil fraud laws of the United States.
 - b. Any presently pending or future action taken by the United States under the criminal laws or civil fraud laws of the United States.


The Department is not aware of any such actions pending against Liberty based on the Clery Act issues addressed in this Agreement.

- 3 -

6. This Agreement does not address or resolve any complaints filed with or any investigations undertaken by the Department's Office of Civil Rights under any applicable law or regulation.

Liberty and the Department each warrant that the undersigned representative is authorized to sign this Agreement on its behalf.


FOR LIBERTY UNIVERSITY



Jerry L. Falwell, Jr.
President
Liberty University

Dated: 12/17/2013

FOR THE UNITED STATES DEPARTMENT OF EDUCATION



Mary E. Gust
Director
Administrative Actions and Appeals Service Group
Federal Student Aid
U.S. Department of Education

Dated: 12/18/2013

From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Thursday, April 22, 2021 6:44 PM
To: [REDACTED]
Subject: FERPA form
Attach: FERPA Release Form.pdf

[REDACTED]

I have attached our standard "FERPA Release Form" that you can fill out and return to me.

I am told that we have your signature on file from 2007, so I do not believe it will be necessary for you to have this form notarized.

As you fill out this form, please know that you have my word that there is no "secret handshake" that you need to know in order to have access to the files. There is no special name or categorization that your files have....and that if you don't use that special name then I won't tell you about the files or let you access them. That's not the way I operate and that's not the way this will proceed.

To that end ... On the form, you'll see "Other" – for the type of files you're releasing. Simply initial that and write in: "All files pertaining to the subject matter that Scott Lamb is coordinating with me about."

As I said in the previous email, I do not have authority over the release of any files. And I myself do not have a copy of the files that pertain to you.

However, I will return to you after a brief process of discovery to ascertain:

- (1) What types of files do we have regarding this situation?
- (2) Do any policies exist that would keep a person from accessing files that pertain to them?
- (3) Is redacting legally required, given that there are other names on the files?
- (4) If redacting is legally required, would [REDACTED] and/or someone she authorizes in her stead be allowed to see the original, unredacted files – in addition to receiving the redacted ones?

I do not know the answers to these questions. But you have my word that there will be transparency in my answers back to you.

Feel free to call if you have any questions or concerns. My cell is listed below.

All the best,
-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Friday, April 23, 2021 5:59 PM
To: Julie Roys <julie@julieroys.com>; [REDACTED]
Subject: Group call?

[REDACTED] and Julie:

Could we jump on a 3-way call?

-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Friday, April 23, 2021 6:00 PM
To: Julie Roys <julie@julieroys.com>; [REDACTED]
Subject: Re: Group call?
Attach: ATT00001.png

(Feel free to record the call)

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 23, 2021, at 5:58 PM, Scott Lamb <scottlamb@liberty.edu> wrote:

[REDACTED] and Julie:

Could we jump on a 3-way call?

-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Monday, April 26, 2021 10:20 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: [External] FERPA Form - [REDACTED]

Got it. Will do.

We will need your mailing address for the documents.

From what I understand, there will be 2 shipments (2 different documents), one from LUPD and one from our General Counsel.

The first should be in the mail by the end of this week. The second should be within a week or two.

All the best,
-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 23, 2021, at 11:37 PM, [REDACTED] wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Please find the attached FERPA form to release (to [REDACTED] and Julie) any and all documentation with my name concerning the information you are coordinating with [REDACTED] on.

Thank you,
[REDACTED]

From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Monday, April 26, 2021 10:21 AM
To: Julie Roys <julie@julieroys.com>
Subject: Re: [External] Address

Got it.

From what I understand, there will be 2 shipments (2 different documents), one from LUPD and one from our General Counsel.

The first should be in the mail by the end of this week. The second should be within a week or two.

All the best,
-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 24, 2021, at 8:33 AM, Julie Roys <julie@julieroys.com> wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Please send [REDACTED] police report and student file to me at:

[REDACTED]
Thanks!
Julie

THE
ROYS  
REPORT
[Website/Facebook/Twitter](#)

From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Monday, April 26, 2021 10:41 AM
To: Julie Roys <julie@julieroys.com>
Subject: Re: [External] Address
Attach: ATT00001.png

Two things in play here:

- 1) I am not in control of the timing. If I were, I'd be happy to send them today, and overnight them.
- 2) The timing is a matter of them (Bucket B at least) needing to be prepared. The "Bucket B" documents have not been previously prepared/redacted by our General Counsel.

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 26, 2021, at 10:36 AM, Julie Roys <julie@julieroys.com> wrote:

Scott,

That's really a long time. Would you please overnight the documents to me this week? I am happy to pay shipping.

Thanks,
Julie

On Mon, Apr 26, 2021 at 9:21 AM Lamb, Scott <scottlamb@liberty.edu> wrote:
Got it.

From what I understand, there will be 2 shipments (2 different documents), one from LUPD and one from our General Counsel.

The first should be in the mail by the end of this week. The second should be within a week or two.

All the best,
-Scott

Scott Lamb
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[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Please send [REDACTED] police report and student file to me at:

[REDACTED]

Lamb Rule 41
Exhibit 10(au)

LU004720

Thanks!
Julie

THE
ROYS  
REPORT
[Website](#)/[Facebook](#)/[Twitter](#)

THE
ROYS  
REPORT
[Website](#)/[Facebook](#)/[Twitter](#)

From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Monday, April 26, 2021 11:01 AM
To: Julie Roys <julie@julieroys.com>
Subject: Re: [External] Address
Attach: ATT00002.png

Yes.

It still won't come from me directly, but I will give this directive to those who will send them out.

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 26, 2021, at 10:47 AM, Julie Roys <julie@julieroys.com> wrote:

Understood. As soon as each is ready, would you please have them overnighted to me?

Thanks,
Julie

On Mon, Apr 26, 2021 at 9:40 AM Lamb, Scott <scottlamb@liberty.edu> wrote:
Two things in play here:

- 1) I am not in control of the timing. If I were, I'd be happy to send them today, and overnight them.
- 2) The timing is a matter of them (Bucket B at least) needing to be prepared. The "Bucket B" documents have not been previously prepared/redacted by our General Counsel.

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 26, 2021, at 10:36 AM, Julie Roys <julie@julieroys.com> wrote:

Scott,

That's really a long time. Would you please overnight the documents to me this week? I am happy to pay shipping.

Thanks,
Julie

On Mon, Apr 26, 2021 at 9:21 AM Lamb, Scott <scottlamb@liberty.edu> wrote:
Got it.

From what I understand, there will be 2 shipments (2 different documents), one from LUPD and one from our General Counsel.

The first should be in the mail by the end of this week. The second should be within a week or two.

All the best,
-Scott

Lamb Rule 41
Exhibit 10(av)

LU004722

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 24, 2021, at 8:33 AM, Julie Roys <julie@julieroys.com> wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Please send [REDACTED] police report and student file to me at:

[REDACTED]

Thanks!
Julie

THE
ROY'S
REPC

[Website](#)/[Facebook](#)/[Twitter](#)

From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Monday, April 26, 2021 12:58 PM
To: [REDACTED]
Subject: Re: [External] FERPA Form - [REDACTED]

Sounds good. What time can you meet?

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 26, 2021, at 12:27 PM, [REDACTED] wrote:

Scott,

I would like to request to pick up both documents this Friday, April 30th. After having received [REDACTED] FERPA, a week should be plenty of time to gather documents for delivery. I understand I may have to receive those from separate offices - LUPD and the office of legal affairs. Please facilitate coordinating those documents for pick up.

Thank you

On Apr 26, 2021, at 10:19 AM, Lamb, Scott <scottlamb@liberty.edu> wrote:

Got it. Will do.

We will need your mailing address for the documents.

From what I understand, there will be 2 shipments (2 different documents), one from LUPD and one from our General Counsel.

The first should be in the mail by the end of this week. The second should be within a week or two.

All the best,
-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

<ATT00001.png>

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On Apr 23, 2021, at 11:37 PM, [REDACTED] wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Please find the attached FERPA form to release (to [REDACTED] and Julie) any and all documentation with my name concerning the information you are coordinating with [REDACTED] on.

Thank you,
[REDACTED]

Lamb Rule 41
Exhibit 10(aw)

LU004726

From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Monday, April 26, 2021 1:55 PM
To: [REDACTED]
Subject: Re: [External] FERPA Form - [REDACTED]

Yes, that's correct.

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 26, 2021, at 1:14 PM, [REDACTED] wrote:

The earlier the better. I am unavailable 1pm-3pm.. Just wanting to confirm it's both sets of documents.

On Apr 26, 2021, at 12:57 PM, Lamb, Scott <scottlamb@liberty.edu> wrote:

Sounds good. What time can you meet?

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

<ATT00001.png>

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On Apr 26, 2021, at 12:27 PM, [REDACTED] wrote:

Scott,

I would like to request to pick up both documents this Friday, April 30th. After having received [REDACTED] FERPA, a week should be plenty of time to gather documents for delivery. I understand I may have to receive those from separate offices - LUPD and the office of legal affairs. Please facilitate coordinating those documents for pick up.

Thank you

On Apr 26, 2021, at 10:19 AM, Lamb, Scott <scottlamb@liberty.edu> wrote:

Got it. Will do.

We will need your mailing address for the documents.

From what I understand, there will be 2 shipments (2 different documents), one from LUPD and one from our General Counsel.

The first should be in the mail by the end of this week. The second should be within a week or two.

All the best,
-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

<ATT00001.png>

Lamb Rule 41
Exhibit 10(ax)

LU004728

On Apr 23, 2021, at 11:37 PM, [REDACTED] wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Please find the attached FERPA form to release (to [REDACTED] and Julie) any and all documentation with my name concerning the information you are coordinating with [REDACTED] on.

Thank you,

[REDACTED]

From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Monday, April 26, 2021 3:32 PM
To: [REDACTED]
Subject: Re: [External] FERPA Form - [REDACTED]

That works for me.

Let's meet at the Hancock Welcome Center. Very easy to find and always ample parking.

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 26, 2021, at 2:10 PM, [REDACTED] wrote:

Thank you. Does 9am work?

On Apr 26, 2021, at 1:54 PM, Lamb, Scott <scottlamb@liberty.edu> wrote:

Yes, that's correct.

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

<ATT00001.png>

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On Apr 26, 2021, at 1:14 PM, [REDACTED] wrote:

The earlier the better. I am unavailable 1pm-3pm.. Just wanting to confirm it's both sets of documents.

On Apr 26, 2021, at 12:57 PM, Lamb, Scott <scottlamb@liberty.edu> wrote:

Sounds good. What time can you meet?

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Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

<ATT00001.png>

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On Apr 26, 2021, at 12:27 PM, [REDACTED] wrote:

Scott,

I would like to request to pick up both documents this Friday, April 30th. After having received [REDACTED] FERPA, a week should be plenty of time to gather documents for delivery. I understand I may have to receive those from separate offices - LUPD and the office of legal affairs. Please facilitate coordinating those documents for pick up.

Thank you

Lamb Rule 41
Exhibit 10(ay)

LU004730

On Apr 26, 2021, at 10:19 AM, Lamb, Scott <scottlamb@liberty.edu> wrote:

Got it. Will do.

We will need your mailing address for the documents.

From what I understand, there will be 2 shipments (2 different documents), one from LUPD and one from our General Counsel.

The first should be in the mail by the end of this week. The second should be within a week or two.

All the best,
-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

<ATT00001.png>

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On Apr 23, 2021, at 11:37 PM, [REDACTED] wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Please find the attached FERPA form to release (to [REDACTED] and Julie) any and all documentation with my name concerning the information you are coordinating with [REDACTED] on.

Thank you,
[REDACTED]

From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Tuesday, April 27, 2021 7:44 AM
To: Jenkins, Robin E (Legal Affairs) <rjenkins22@liberty.edu>
Cc: Corry, David M (Legal Affairs) <dccorry@liberty.edu>
Subject: FERPA Form - [REDACTED]
Attach: FERPA-Warren-C.pdf

On Apr 23, 2021, at 11:37 PM, [REDACTED] wrote:

Hi Scott,

Please find the attached FERPA form to release (to [REDACTED] and Julie) any and all documentation with my name concerning the information you are coordinating with [REDACTED] on.

Thank you,
[REDACTED]

Lamb Rule 41
Exhibit 10(az)

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REGISTRAR

FR

Student's Name _____

1971 University Blvd. Lynchburg, VA 24515-2269

Phone 434-592-5100 Fax 434-582-2187

FERPA Release Form

It is the policy of Liberty University, in accordance with the Family Educational Rights and Privacy Act (FERPA), to withhold personally identifiable information contained in our students' educational records unless the student has consented to disclosure or FERPA allows disclosure. Information, such as name and address, may be disclosed to the public. However, private information, such as grades, class schedules, the student's account, and financial aid awards may not be released or discussed without express consent from the student.

Signing this form provides such consent, according to the information designated for release and to whom it is to be released.

I, _____, _____, authorize Liberty University to release the following educational records, upon request, to the persons listed below, for the purpose of keeping them informed regarding my education at Liberty University.

Please initial all that apply:

_____ All financial records in the Student Accounts Office.

_____ All Financial Aid information.

_____ All academic records.

 X Other *All files pertaining to the subject matter that Scott Lamb is coordinating with* _____
_____ about.

 Persons to whom information may be released:

Name: _____

Name: *Julie Roys* _____

Name: _____

I acknowledge by my signature that I understand that, although I am not required to release my records, I am giving my consent to release the designated information to the above named person(s). I understand that this release will remain in effect unless I revoke such consent in writing and the revocation is received and processed by Liberty University.

Signature: _____ Date: *4/23/21* _____

5/2007

White – Registrar's Office

Yellow – Financial Aid

Pink – Student Accounts

From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Tuesday, April 27, 2021 7:46 AM
To: Jenkins, Robin E (Legal Affairs) <rjenkins22@liberty.edu>
Cc: Corry, David M (Legal Affairs) <dcorry@liberty.edu>
Subject: FERPA form: [REDACTED]
Attach: [REDACTED]

On Apr 23, 2021, at 8:45 AM, [REDACTED] wrote:

Scott,

Signed FERPA is attached. I do not recall my student number but police records/reports and other documents are able to be located under my maiden name
[REDACTED]

Thank you

Lamb Rule 41
Exhibit 10(ba)

Student ID# _____

Student's Name _____

LIBERTY

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REGISTRAR

FR

1971 University Blvd. Lynchburg, VA 24515-2269

Phone 434-592-5100 Fax 434-582-2187

FERPA Release Form

It is the policy of Liberty University, in accordance with the Family Educational Rights and Privacy Act (FERPA), to withhold personally identifiable information contained in our students' educational records unless the student has consented to disclosure or FERPA allows disclosure. Information, such as name and address, may be disclosed to the public. However, private information, such as grades, class schedules, the student's account, and financial aid awards may not be released or discussed without express consent from the student.

Signing this form provides such consent, according to the information designated for release and to whom it is to be released.

I, _____, Student ID Number _____, authorize Liberty University to release the following educational records, upon request, to the persons listed below, for the purpose of keeping them informed regarding my education at Liberty University.

Please initial all that apply:

_____ All financial records in the Student Accounts Office.

_____ All Financial Aid information.

_____ All academic records.

Other All files pertaining to the subject matter that Scott Lamb is coordinating with me about

Persons to whom information may be released:

Name: Julie Roys

Name: _____

Name: _____

I acknowledge by my signature that I understand that, although I am not required to release my records, I am giving my consent to release the designated information to the above named person(s). I understand that this release will remain in effect unless I revoke such consent in writing and the revocation is received and processed by Liberty University.

Signature: _____ Date: 4-22-21

5/2007

White – Registrar's Office

Yellow – Financial Aid

Pink – Student Accounts

From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Wednesday, April 28, 2021 1:22 PM
To: Julie Roys <julie@julieroys.com>
Subject: MEDIA INQUIRY: [REDACTED]
Attach: ATT00001.png

Julie:

You are lined up to receive the reports and those contain new information core to your understanding of these events. It would be premature for us to answer these questions ahead of your obtaining and reviewing these documents.

Also, please note that it is [REDACTED] herself who will send the LUPD document to you ("Bucket A") – not Liberty University. She will be receiving three copies of that report, as I've asked that we go ahead and make 3 copies, to expedite her sending them to the two people on her FERPA, you and [REDACTED]. But we are not allowed to send the police report to you and [REDACTED] directly, even with the FERPA.

All the best,
-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 28, 2021, at 12:35 PM, Julie Roys <julie@julieroys.com> wrote:

Scott,

I've attached an updated list of questions, which reflects the information in the documents you sent Friday.

My initial questions were sent more than a month ago and I would appreciate answers by the end of this week. Would you be able to produce those by then? I can understand if the updated questions might take a bit longer, but I would think a month is more than enough time to answer the questions I sent previously.

Thank you,
Julie

On Thu, Apr 15, 2021 at 3:54 PM Julie Roys <julie@julieroys.com> wrote:

Scott,

Sorry I didn't respond earlier to your voicemail. I am holding and awaiting LU's response to the questions next week.

Thanks!
Julie

On Tue, Apr 6, 2021 at 10:55 AM Julie Roys <julie@julieroys.com> wrote:

Sure. Thanks for the update.

On Tue, Apr 6, 2021 at 9:45 AM Lamb, Scott <scottlamb@liberty.edu> wrote:

Folks have been out (Easter and Spring Break).

Let me see what they're prepared to do this week.

Scott Lamb
Senior Vice President of Communications and Public Engagement

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Lamb Rule 41
Exhibit 10(bb)

LU004736

On Apr 6, 2021, at 10:26 AM, Julie Roys <julie@julieroys.com> wrote:

Hi Scott,

Reaching out one last time. Are you planning on responding to my detailed questions? If so, would you please let me know when I should expect them?

Thank you,
Julie

On Thu, Apr 1, 2021 at 12:11 PM Julie Roys <julie@julieroys.com> wrote:

Scott,

Can you have these answers to me by end of the day Monday?

Thanks,
Julie

On Fri, Mar 26, 2021 at 7:15 PM Lamb, Scott <scottlamb@liberty.edu> wrote:

We are working on this. -Scott

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From: Julie Roys <julie@julieroys.com>

Sent: Tuesday, March 23, 2021 5:13:39 PM

To: Lamb, Scott <scottlamb@liberty.edu>

Subject: [External] Questions concerning 2005 gang rape

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Thanks for taking my call the other day. Attached are detailed questions for LU, several employees, and Jonathan Falwell concerning the 2005 alleged gang rape of [REDACTED]

[REDACTED] case resulted in the 2013 settlement between Liberty and the U.S. Dept of Education for Liberty's failure to comply with federal campus crime and security reporting requirements. However, it appears that because of a technicality, Liberty was able to avoid reporting that [REDACTED] was gang raped in 2005. Instead, the school was fined for not classifying the incident as an "Aggravated Assault, at a minimum."

[REDACTED] story raises many issues about Liberty's reporting of crimes and care for victims. The victim also is upset that Jonathan Falwell allegedly promised that her case would be part of the third-party investigation Liberty is conducting, but it's not.

I would prefer to have actual conversations with sources concerning these issues. If that is possible, please let me know.

Thank you,
Julie Roys

—
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—
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ROYS  
REPORT
[Website/Facebook/Twitter](#)

From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Friday, April 30, 2021 12:32 PM
To: Julie Roys <julie@julieroys.com>
Subject: Re: [External] Re: MEDIA INQUIRY: [REDACTED]
Attach: ATT00002.png

Feel free to call.

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On Apr 30, 2021, at 10:00 AM, Julie Roys <julie@julieroys.com> wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

[REDACTED] said she received 3 copies of her student file, not her police report. Just to clarify... Is Liberty overnighting the student file to me or does [REDACTED] need to do that?

Thanks,
Julie

On Wed, Apr 28, 2021 at 12:22 PM Lamb, Scott <scottlamb@liberty.edu> wrote:
Julie:

You are lined up to receive the reports and those contain new information core to your understanding of these events. It would be premature for us to answer these questions ahead of your obtaining and reviewing these documents.

Also, please note that it is [REDACTED] herself who will send the LUPD document to you ("Bucket A") – not Liberty University. She will be receiving three copies of that report, as I've asked that we go ahead and make 3 copies, to expedite her sending them to the two people on her FERPA, you and [REDACTED]. But we are not allowed to send the police report to you and [REDACTED] directly, even with the FERPA.

All the best,
-Scott

Scott Lamb
Senior Vice President of Communications and Public Engagement

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Office (434) 592-6836

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On Apr 28, 2021, at 12:35 PM, Julie Roys <julie@julieroys.com> wrote:

Scott,

I've attached an updated list of questions, which reflects the information in the documents you sent Friday.

My initial questions were sent more than a month ago and I would appreciate answers by the end of this week. Would you be able to produce those by then? I can understand if the updated questions might take a bit longer, but I would think a month is more than enough time to answer the questions I sent previously.

Lamb Rule 41
Exhibit 10(bc)

LU004742

Thank you,
Julie

On Thu, Apr 15, 2021 at 3:54 PM Julie Roys <julie@julieroys.com> wrote:

Scott,

Sorry I didn't respond earlier to your voicemail. I am holding and awaiting LU's response to the questions next week.

Thanks!
Julie

On Tue, Apr 6, 2021 at 10:55 AM Julie Roys <julie@julieroys.com> wrote:

Sure. Thanks for the update.

On Tue, Apr 6, 2021 at 9:45 AM Lamb, Scott <scottlamb@liberty.edu> wrote:

Folks have been out (Easter and Spring Break).

Let me see what they're prepared to do this week.

Scott Lamb

Senior Vice President of Communications and Public Engagement

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On Apr 6, 2021, at 10:26 AM, Julie Roys <julie@julieroys.com> wrote:

Hi Scott,

Reaching out one last time. Are you planning on responding to my detailed questions? If so, would you please let me know when I should expect them?

Thank you,
Julie

On Thu, Apr 1, 2021 at 12:11 PM Julie Roys <julie@julieroys.com> wrote:

Scott,

Can you have these answers to me by end of the day Monday?

Thanks,
Julie

On Fri, Mar 26, 2021 at 7:15 PM Lamb, Scott <scottlamb@liberty.edu> wrote:

We are working on this. -Scott

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From: Julie Roys <julie@julieroys.com>

Sent: Tuesday, March 23, 2021 5:13:39 PM

To: Lamb, Scott <scottlamb@liberty.edu>

Subject: [External] Questions concerning 2005 gang rape

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

Thanks for taking my call the other day. Attached are detailed questions for LU, several employees, and Jonathan Falwell concerning the 2005 alleged gang rape of [REDACTED]

[REDACTED] case resulted in the 2013 settlement between Liberty and the U.S. Dept of Education for Liberty's failure to comply with federal campus crime and security reporting requirements. However, it appears that because of a technicality, Liberty was able to avoid reporting that [REDACTED] was gang raped in 2005. Instead, the school was fined for not classifying the incident as an "Aggravated Assault, at a minimum."

[REDACTED] story raises many issues about Liberty's reporting of crimes and care for victims. The victim also is upset that Jonathan Falwell allegedly promised that her case would be part of the third-party investigation Liberty is conducting, but it's not.

I would prefer to have actual conversations with sources concerning these issues. If that is possible, please let me know.

Thank you,
Julie Roys

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From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Monday, May 3, 2021 10:58 AM
To: Corry, David M (Legal Affairs) <dcorry@liberty.edu>; Hammonds, Sandra Gail (Legal Affairs) <sghammonds@liberty.edu>
Subject: MEDIA REQUEST: Julie Roys -- asking for David Corry -- regarding [REDACTED]

On May 3, 2021, at 10:48 AM, Julie Roys <julie@julieroys.com> wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi Scott,

I have received the police reports and [REDACTED] file and reviewed all of them. I would like to schedule a time to interview David Corry in the next few days. I'll also have an updated list of questions to you shortly.

Thanks for your help!
Julie

THE
ROYS  
REPORT
[Website](#)/[Facebook](#)/[Twitter](#)

Lamb Rule 41
Exhibit 10(bd)

From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Tuesday, May 4, 2021 11:29 AM
To: Corry, David M (Legal Affairs) <dcorry@liberty.edu>
Cc: Julie Roys <julie@julieroys.com>
Subject: RE: [External] Re: [REDACTED] - Media Request

Julie:

I'm sorry for the misunderstanding. I thought I had coached this process as an off-the-record conversation being the first step. ...and that we'd go from there.

Are you still desiring an off-the -record conversation for background purposes?

Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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On May 4, 2021, at 10:06 AM, David M Corry <dcorry@liberty.edu> wrote:

Julie:

I am sorry for the misunderstanding. After our off the record discussion, we can decide what else may be provided on the record. We just need to be sure you understand all that you already have and what it means first.

David M. Corry
General Counsel

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From: Julie Roys <julie@julieroys.com>
Sent: Tuesday, May 4, 2021 10:03 AM
To: Corry, David M (Legal Affairs) <dcorry@liberty.edu>; Lamb, Scott <scottlamb@liberty.edu>
Subject: Re: [External] Re: [REDACTED] - Media Request

Oh, I was under the impression we were having an on-the-record discussion. So, no one from Liberty is going to speak on-the-record? Will there be a statement?

On Tue, May 4, 2021 at 7:53 AM Corry, David M (Legal Affairs) <dcorry@liberty.edu> wrote:

No, Julie. You do not have my consent to record our discussion. The discussion is off the record for background purposes only.

David Corry

Sent from my iPhone

Lamb Rule 41
Exhibit 10(be)

LU004750

On May 3, 2021, at 10:58 PM, Julie Roys <julie@juleroys.com> wrote:

[EXTERNAL EMAIL: Do not click any links or open attachments unless you know the sender and trust the content.]

Hi David,

I would like to conduct this interview over a third-party platform. Also, may I have your permission to record our interview?

Here's a Zoom link:

Topic: Interview with David Correy

Time: May 5, 2021 09:00 AM Central Time (US and Canada)

Join Zoom Meeting

<https://us02web.zoom.us/j/3674854556?pwd=QmRISXo0dGpSb2RabTYzZFR3dzd4QT09>

Meeting ID: 367 485 4556

Passcode: 8H8Tn

On Mon, May 3, 2021 at 11:49 AM Corry, David M (Legal Affairs) <dcorry@liberty.edu> wrote:

-- Do not delete or change any of the following text. --

When it's time, join your Webex meeting here.

Join meeting

More ways to join:

Join from the meeting link

<https://libertyu.webex.com/libertyu/j.php?MTID=ma7387daf2373127d32feccbc8c0de2a2>

Join by meeting number

Meeting number (access code): 132 784 3419

Meeting password: 3dkZg3vBW6Z

Tap to join from a mobile device (attendees only)

+1-408-418-9388,,1327843419## United States Toll

Join by phone

+1-408-418-9388 United States Toll

Global call-in numbers

Join from a video system or application

Dial [1327843419@libertyu.webex.com](tel:1327843419@libertyu.webex.com)

You can also dial 173.243.2.68 and enter your meeting number.

Join using Microsoft Lync or Microsoft Skype for Business

Dial [1327843419](tel:1327843419). libertyu@lync.webex.com

If you are a host, [click here](#) to view host information.

Need help? Go to <https://help.webex.com>



From: Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>
Sent: Wednesday, May 5, 2021 5:10 PM
To: Corry, David M (Legal Affairs) <dcorry@liberty.edu>
Subject: "Unbiased reporting"



Roys "liked" this post above.

And here's another [REDACTED] tweet – this one mentions you.



Scott Lamb
Senior Vice President of Communications and Public Engagement

Cell (434) 262-2771
Office (434) 592-6836

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Lamb Rule 41
Exhibit 10(bf)

Subject: Meet [REDACTED] at Hancock Center to hand off documents

Location: Hancock Welcome Center (1971 University Blvd, Lynchburg, VA 24515, United States)

Start: 4/30/2021 9:00 AM

End: 4/30/2021 9:30 AM

Show Time As: Busy

Recurrence: (none)

Meeting Status: Organizer

Organizer: Lamb, Scott

Required Attendees: Corry, David M (Legal Affairs); Sloan, Ronald Thomas; Hinkley, Richard Dale (Police Department (LUPD))

Resources: Hancock Welcome Center (1971 University Blvd, Lynchburg, VA 24515, United States)

Subject: [REDACTED] Media Request

Location: ZOOM Meeting

Start: 5/5/2021 10:00 AM

End: 5/5/2021 11:30 AM

Show Time As: Busy

Recurrence: (none)

Meeting Status: Accepted

Organizer: Corry, David M (Legal Affairs)

Required Attendees: Lamb, Scott

Neal and Julie Roys is inviting you to a scheduled Zoom meeting.

Topic: Interview with David Correy

Time: May 5, 2021 09:00 AM Central Time (US and Canada)

Join Zoom Meeting

<https://us02web.zoom.us/j/3674854556?pwd=QmRISXo0dGpSb2RabTYzZFR3dzd4QT09>

Meeting ID: 367 485 4556

Passcode: 8H8TTn

Subject: [REDACTED] - Media Request

Location: WebEx

Start: 5/5/2021 10:00 AM

End: 5/5/2021 11:00 AM

Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Corry, David M (Legal Affairs)

Required Attendees: julie@julieroys.com; Lamb, Scott

Resources: WebEx

Subject: [REDACTED] - Media Request

Location: ZOOM Meeting

Start: 5/5/2021 10:00 AM

End: 5/5/2021 11:30 AM

Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Corry, David M (Legal Affairs)

Required Attendees: Lamb, Scott

Resources: ZOOM Meeting

Neal and Julie Roys is inviting you to a scheduled Zoom meeting.

Topic: Interview with David Correy

Time: May 5, 2021 09:00 AM Central Time (US and Canada)

Join Zoom Meeting

<https://us02web.zoom.us/j/3674854556?pwd=QmRlSXo0dGpSb2RabTYzZFR3dzd4QT09>

Meeting ID: 367 485 4556

Passcode: 8H8TTn

Lamb Rule 41
Exhibit 10(bj)

LU004965

Subject: Canceled: [REDACTED] - Media Request

Location: WebEx

Start: 5/5/2021 10:00 AM

End: 5/5/2021 11:00 AM

Show Time As: Free

Recurrence: (none)

Organizer: Corry, David M (Legal Affairs)

Required Attendees: julie@julieroys.com; Lamb, Scott

Resources: WebEx

Lamb Rule 41
Exhibit 10(bk)

LU004966



Paul Southwick

@PaulSouthwick



Liberty University continues to promote conversion therapy on campus. Conversion therapy kills LGBTQ+ kids. Our government should not be funding it.



Religious Exemption Accountability Project @REAP_LGBTQ · 3h

From conversion therapy clubs to lessons about the "evils of the homosexual lifestyle," the homophobic culture at @LibertyU is dangerous for #LGBTQ students.

@NBCNews interviews our plaintiff [REDACTED] an alum of Liberty, on why he joined this case: nbcnews.to/3sJ5HVe

10:46 AM · Mar 31, 2021 from Portland, OR · Twitter for iPhone



Subject: Accepted: Discuss Documents re: [REDACTED]
Location: Suite 2730 Legal Affairs Conference Room
Start: 4/23/2021 3:00 PM
End: 4/23/2021 3:30 PM
Show Time As: Busy
Recurrence: (none)
Organizer: Lamb, Scott
Required Attendees: Corry, David M (Legal Affairs)
Resources: Suite 2730 Legal Affairs Conference Room

Lamb Rule 41
Exhibit 10(bm)

Subject: Meet [REDACTED] at Hancock Center to hand off documents

Location: Hancock Welcome Center (1971 University Blvd, Lynchburg, VA 24515, United States)

Start: 4/30/2021 9:00 AM

End: 4/30/2021 9:30 AM

Show Time As: Tentative

Recurrence: (none)

Meeting Status: Received

Organizer: Lamb, Scott

Required Attendees: Corry, David M (Legal Affairs); Sloan, Ronald Thomas; Hinkley, Richard Dale (Police Department (LUPD))

Resources: Hancock Welcome Center (1971 University Blvd, Lynchburg, VA 24515, United States)

Lamb Rule 41
Exhibit 10(bn)